

AMOS
VS
THE LAMPO GROUP, LLC.

ARMANDO LOPEZ

October 25, 2022



Nicole M. DeBartolo, CSR, RPR, LCR

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IN THE CHANCERY COURT FOR WILLIAMSON COUNTY,
TENNESSEE

BRAD AMOS,

Plaintiff,

VS.

Case No.

21CV-50339M

THE LAMPO GROUP, LLC,
d/b/a RAMSEY SOLUTIONS;
DAVE RAMSEY,

Defendants.

Video Deposition of:

ARMANDO LOPEZ

Taken on behalf of the Plaintiff
October 25, 2022

Commencing at 9:50 a.m.

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<div> <div>Page 2</div> <div>A P P E A R A N C E S</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4 For the Plaintiff:</div> <div>5 MR. JONATHAN STREET</div> <div>6 MS. LAUREN IRWIN</div> <div>7 Attorneys at Law</div> <div>8 Employment and Consumer Law Group</div> <div>9 1720 West End Avenue</div> <div>10 Suite 402</div> <div>11 Nashville, Tennessee 37203</div> <div>12 (615) 850.0632</div> <div>13 street@eclaw.com</div> <div>14 lauren@eclaw.com</div> <div>15</div> <div>16 For the Defendants:</div> <div>17 MS. LESLIE GOFF SANDERS</div> <div>18 Attorney at Law</div> <div>19 Jackson Lewis P.C.</div> <div>20 611 Commerce Street</div> <div>21 Suite 3102</div> <div>22 Nashville, Tennessee 37203</div> <div>23 (615) 565-1661</div> <div>24 leslie.sanders@jacksonlewis.com</div> <div>25</div> <div>26 MR. DANIEL E. CORTEZ</div> <div>27 Attorney at Law</div> <div>28 The Lampo Group</div> <div>29 1011 Reams Fleming Boulevard</div> <div>30 Franklin, Tennessee 37064</div> <div>31 (615) 371-8881</div> <div>32</div> <div>33 ALSO PRESENT:</div> <div>34 MS. SOPHIA GORDON - Videographer</div> <div>35</div> </div> </div>	<div> <div>Page 4</div> <div>S T I P U L A T I O N S</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5 The video deposition of ARMANDO LOPEZ was</div> <div>6 taken by counsel for the plaintiff, by Notice,</div> <div>7 at the offices of Jackson Lewis, P.C.,</div> <div>8 611 Commerce Street, Suite 3102, Nashville,</div> <div>9 Tennessee, on October 25, 2022, for all</div> <div>10 purposes under the Tennessee Rules of Civil</div> <div>11 Procedure.</div> <div>12 All formalities as to caption, notice,</div> <div>13 statement of appearance, et cetera, are waived.</div> <div>14 All objections, except as to the form of the</div> <div>15 question, are reserved for the hearing, and</div> <div>16 that said deposition may be read and used in</div> <div>17 evidence in said cause of action in any trial</div> <div>18 thereon or any proceeding herein.</div> <div>19 It is agreed that Nicole Marie DeBartolo,</div> <div>20 TN LCR, RPR, IL CSR, and Court Reporter for the</div> <div>21 State of Tennessee, may swear the witness, and</div> <div>22 that the reading and signing of the completed</div> <div>23 deposition by the witness are not waived.</div> <div>24</div> <div>25</div> </div> </div>
<div> <div>Page 3</div> <div>I N D E X</div> <div> <div>1</div> <div>2</div> <div>3 Examination</div> <div>4 By Mr. Street</div> <div>5</div> <div>6 E X H I B I T S</div> <div>7</div> <div>8 Exhibit 1</div> <div>9 Notice of deposition</div> <div>10</div> <div>11 Exhibit 2</div> <div>12 Amended notice of deposition</div> <div>13 Exhibit 3</div> <div>14 Brad Amos Jobvite evaluations</div> <div>15</div> <div>16 Exhibit 4</div> <div>17 E-mails associated with Brad Amos</div> <div>18 Exhibit 5</div> <div>19 Lampo's Responses to Plaintiff's</div> <div>20 First Set of Interrogatories</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> </div>	<div> <div>Page 5</div> <div>* * *</div> <div> <div>1</div> <div>2 THE VIDEOGRAPHER: We are now on the</div> <div>3 record. Today is Tuesday, the 25th of October,</div> <div>4 2022, and the time indicated on the video</div> <div>5 screen is 10:17 a.m.</div> <div>6 This is the 30(b)(6) video deposition of</div> <div>7 Armando Lopez, a representative of The Lampo</div> <div>8 Group, LLC, in the matter of Amos versus The</div> <div>9 Lampo Group, LLC, et al.,</div> <div>10 Case No. 3:21-cv-00923, filed in the United</div> <div>11 States District Court for the Middle District</div> <div>12 of Tennessee, Nashville Division.</div> <div>13 This deposition is being held today at</div> <div>14 611 Commerce Street, Nashville, Tennessee,</div> <div>15 37203.</div> <div>16 My name is Sofia Gordan, the</div> <div>17 videographer; the court reporter is Nicole</div> <div>18 DeBartolo; both in association with Elite</div> <div>19 Brentwood Reporting Services.</div> <div>20 Will counsel please introduce yourselves</div> <div>21 and state whom you represent.</div> <div>22 MR. STREET: Jonathan Street. I'm</div> <div>23 here for the plaintiff, Brad Amos.</div> <div>24 MS. IRWIN: Lauren Irwin for the</div> <div>25 plaintiff, Brad Amos.</div> </div> </div>

<p style="text-align: right;">Page 6</p> <p>1 MS. SANDERS: Leslie Sanders for 2 defendant, The Lampo Group. 3 MR. CORTEZ: Daniel Cortez for 4 defendant, The Lampo Group. 5 THE VIDEOGRAPHER: Would the court 6 reporter please swear in the witness. 7 (Witness sworn.) 8 * * * 9 10 ARMANDO LOPEZ, 11 was called as a witness, and after having been 12 first duly sworn, testified as follows: 13 14 EXAMINATION 15 QUESTIONS BY MR. STREET: 16 Q. Would you state your name for the record, 17 please. 18 A. Sure. Armando Lopez. 19 Q. Mr. Lopez, have you been in a deposition 20 before? 21 A. I have. 22 Q. Okay. And what was that regarding? 23 A. I've been in several, actually, just as 24 the head of human resources, both with Ramsey 25 as well as with my previous employments.</p>	<p style="text-align: right;">Page 8</p> <p>1 corporation, not on behalf of yourself. So if 2 I ask questions today, the questions are 3 directed to the corporation. This is not your 4 personal deposition. This is just for the 5 corporation. 6 A. Yes, sir. 7 Q. So if you'll take a look -- 8 MR. STREET: If we'll go ahead and 9 mark this notice as Exhibit 1. 10 (WHEREUPON, a document was marked as 11 Exhibit 1.) 12 MS. SANDERS: John, if you'll give me 13 just a minute. I thought I had it pulled up, 14 and I don't, so -- 15 MR. STREET: That's okay. 16 MS. SANDERS: If you'll give me just 17 a minute. 18 MR. STREET: Just let me know when 19 you're ready. 20 MS. SANDERS: Okay. We're good. 21 We've got a copy. 22 BY MR. STREET: 23 Q. Okay. If you'll take a second, 24 Mr. Lopez, and look through that. And do you 25 see where it lists the topics? It starts on</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. Okay. Well, the ones with Ramsey, what 2 were those about? 3 A. One was a charge of discrimination. 4 Q. Do you remember the name of the case? 5 A. That would be Caitlin O'Connor. And 6 actually with Ramsey, that is the only one. 7 Q. Okay. But before that, you've been in 8 depositions with your previous employer? 9 A. Correct. 10 Q. Which was who? 11 A. That's American Blue Ribbon Holdings. 12 Q. Okay. Are they a local town -- 13 A. They have. 14 Q. Local company, excuse me. 15 Okay. And have you ever testified as a 16 30(b)(6) witness before? 17 A. I have. 18 Q. Okay. So you kind of know how it works? 19 A. A little bit, yes. 20 Q. Okay. 21 A. I'm not expert, but yes. 22 Q. Well, that's good you're no expert. That 23 means you'd be a lawyer, and nobody likes us. 24 So a 30(b)(6) deposition means you're 25 here today to testify on behalf of the</p>	<p style="text-align: right;">Page 9</p> <p>1 the first page, the first topic being "The 2 factual basis for Defendant -- Defendant's 3 affirmative defenses." 4 Do you see that, No. 1? 5 A. Yes, sir. 6 Q. And then it goes on for a few more pages. 7 A. Ending with No. 28? 8 Q. No. 28. Okay. 9 If you'll read those topics for me and 10 tell me if there are any of those topics that 11 you are not prepared to testify to today -- 12 A. Sure. 13 Q. -- on behalf of the corporation. 14 MR. STREET: Is that me? 15 MS. IRWIN: No. I already turned you 16 down. 17 MS. SANDERS: It was me. 18 MS. IRWIN: It's almost always John. 19 MS. SANDERS: While -- while he's 20 reviewing that, is that the amended notice, or 21 was there an amended notice? 22 MS. IRWIN: The amended notice just 23 had the correct date. The topics are the same. 24 MS. SANDERS: Okay. Because we're 25 looking at the original.</p>

<p style="text-align: right;">Page 10</p> <p>1 MS. IRWIN: Yeah.</p> <p>2 MS. SANDERS: So I just wanted to</p> <p>3 make sure we're --</p> <p>4 MS. IRWIN: Topics are the same; just</p> <p>5 has the date and address corrected.</p> <p>6 MS. SANDERS: All right.</p> <p>7 MR. STREET: That's a good point.</p> <p>8 THE WITNESS: Yes, sir, I reviewed</p> <p>9 it.</p> <p>10 MR. STREET: And as your lawyer</p> <p>11 pointed out in a little break here, this</p> <p>12 isn't -- there's been an amended notice to the</p> <p>13 deposition, but the topics remained the same</p> <p>14 for the notice. And if it's okay, we'll get a</p> <p>15 late-filed exhibit --</p> <p>16 MS. SANDERS: That's fine.</p> <p>17 MR. STREET: -- to -- this will be</p> <p>18 the amended notice.</p> <p>19 (WHEREUPON, a document was designated to</p> <p>20 be marked as Late-Filed Exhibit 2, when</p> <p>21 provided.)</p> <p>22 MS. SANDERS: No objection.</p> <p>23 BY MR. STREET:</p> <p>24 Q. But you're prepared to testify to all</p> <p>25 those topics today?</p>	<p style="text-align: right;">Page 12</p> <p>1 dates memorized, but I know he applied for four</p> <p>2 positions. I believe the first one was in</p> <p>3 2017.</p> <p>4 Q. Okay. And there would be documentation</p> <p>5 provided by Lampo that provide the exact date</p> <p>6 if we wanted to know?</p> <p>7 A. That's exactly right.</p> <p>8 Q. All right. What was the -- you say "the</p> <p>9 first one." He applied for four positions.</p> <p>10 What were the four positions?</p> <p>11 A. I would have to reference the documents</p> <p>12 to be able to tell you all four.</p> <p>13 Q. Okay. But one you said was -- I'm sorry.</p> <p>14 I didn't write it down.</p> <p>15 A. So he applied for one in 2017, then the</p> <p>16 next three were all 2019, and I believe that</p> <p>17 those were closer in dates.</p> <p>18 Q. Okay. I want to hand you what's -- is</p> <p>19 marked --</p> <p>20 MR. STREET: Is the stuff that came</p> <p>21 in yesterday?</p> <p>22 MS. IRWIN: It is.</p> <p>23 MR. STREET: Okay. You got a copy</p> <p>24 for Leslie?</p> <p>25 MS. IRWIN: Yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Some of them are pretty broad, but I</p> <p>2 believe I'm prepared to testify to all of them.</p> <p>3 Q. And the reason I ask this, I want to make</p> <p>4 sure you understand -- you know your answers</p> <p>5 are binding on the corporation today.</p> <p>6 A. Correct.</p> <p>7 Q. You know, normally, you may not have that</p> <p>8 power, but today, you do.</p> <p>9 So all right. We're going to jump around</p> <p>10 a little bit today.</p> <p>11 Tell me about how -- and just so you</p> <p>12 know, I know you've been in a deposition</p> <p>13 before, I'm not going to waste a whole bunch of</p> <p>14 time asking about your 40 years of education</p> <p>15 and your work history and all that.</p> <p>16 A. Okay.</p> <p>17 Q. Especially not for today when it's not</p> <p>18 even your deposition.</p> <p>19 Tell me about how Brad Amos first came</p> <p>20 into contact with The Lampo Group.</p> <p>21 A. Brad Amos would have applied for a</p> <p>22 position, and that's how he came in contact</p> <p>23 with The Lampo Group.</p> <p>24 Q. Okay. Do you know when he applied?</p> <p>25 A. Yes. However, we -- I don't have the</p>	<p style="text-align: right;">Page 13</p> <p>1 MS. SANDERS: Can we go off the</p> <p>2 record for just a minute? I don't mind if it's</p> <p>3 on the record, but let's go off, and then you</p> <p>4 tell me if you want it on.</p> <p>5 THE VIDEOGRAPHER: We are -- we are</p> <p>6 going off the record. The time on the video</p> <p>7 screen is 10:24 a.m.</p> <p>8 (Short break.)</p> <p>9 THE VIDEOGRAPHER: We are back on the</p> <p>10 record. The time on the video monitor is</p> <p>11 10:25 a.m.</p> <p>12 MR. STREET: All right. Can we mark</p> <p>13 this as Exhibit No. 3, please?</p> <p>14 (WHEREUPON, a document was marked as</p> <p>15 Exhibit 3.)</p> <p>16 BY MR. STREET:</p> <p>17 Q. All right. Mr. Lopez, do you recognize</p> <p>18 these documents I've handed you there?</p> <p>19 A. Yes, sir. They come out of our Jobvite</p> <p>20 system.</p> <p>21 Q. Okay. What is the Jobvite system?</p> <p>22 A. It's an applicant tracking software. It</p> <p>23 would be where candidates would apply for</p> <p>24 positions, be scheduled for interviews. Notes</p> <p>25 on those interviews would be kept in that</p>

<p style="text-align: right;">Page 14</p> <p>1 system as well as evaluations of how well they</p> <p>2 did.</p> <p>3 Q. Okay. And you said you're in HR?</p> <p>4 A. Correct.</p> <p>5 Q. And this is -- I'm sorry. This is a</p> <p>6 personal question.</p> <p>7 So you're familiar with these personally?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Back -- back to your corporate hat</p> <p>10 on again.</p> <p>11 A. Yup.</p> <p>12 Q. If you'll flip through these, does this</p> <p>13 help you kind of refresh your memory as to what</p> <p>14 the positions were and when Mr. Amos applied</p> <p>15 for them?</p> <p>16 A. Yes.</p> <p>17 So on the upper right-hand corner, it</p> <p>18 looks like the first -- on Exhibit 1, page --</p> <p>19 Q. Or Exhibit No. 3, you mean?</p> <p>20 A. Exhibit No. 3. I'm sorry.</p> <p>21 Q. That's okay.</p> <p>22 A. That is titled LAMPO_0509.</p> <p>23 Q. Okay.</p> <p>24 A. So at the very top right-hand corner, it</p> <p>25 will say this is for position senior video</p>	<p style="text-align: right;">Page 16</p> <p>1 A. I'm sorry. Where do you see that?</p> <p>2 Q. It's on the top underneath the job title.</p> <p>3 A. Yes.</p> <p>4 Q. Posting date, created 3/8/2017?</p> <p>5 A. Yeah. The posting was created on that</p> <p>6 date. That is the not the date he would have</p> <p>7 applied for. The date that he applied is</p> <p>8 actually not listed here --</p> <p>9 Q. Okay.</p> <p>10 A. -- on this screenshot.</p> <p>11 Q. It says updated 6/21/2019. What does</p> <p>12 that mean when it says updated?</p> <p>13 A. That means that a recruiter would have</p> <p>14 gone in to that req and either updated it,</p> <p>15 closed it, copied it to create another posting.</p> <p>16 They would have opened that requisition for</p> <p>17 some reason.</p> <p>18 Q. Okay. But as you look here, you can't</p> <p>19 tell. There was one for senior video editor,</p> <p>20 video producer, associate creative director,</p> <p>21 and video producer, correct?</p> <p>22 A. That is correct.</p> <p>23 Q. Those are the four positions?</p> <p>24 A. Yeah, that's correct.</p> <p>25 Q. And those appear on 516 to 519, LAMPO_516</p>
<p style="text-align: right;">Page 15</p> <p>1 editor, and the 11675 is a requisition number</p> <p>2 for us. It looks like this was applied on</p> <p>3 May 8, 2019, at 9:34 is when Brad would have</p> <p>4 applied for that role.</p> <p>5 Q. Okay.</p> <p>6 A. So that's one of the roles.</p> <p>7 The second role -- that's actually -- 511</p> <p>8 is the exact same role, as is 512.</p> <p>9 Beginning on page listed LAMPO_0517, the</p> <p>10 second position is video producer. It's req</p> <p>11 number 11721.</p> <p>12 Q. Okay.</p> <p>13 A. On Page 0 -- LAMPO_0519, associate</p> <p>14 creative director is the next position. It's</p> <p>15 req number 11360.</p> <p>16 Q. Okay.</p> <p>17 A. And video producer would be the fourth</p> <p>18 one, and that is req number 10455 as shown on</p> <p>19 page Lampo_0519.</p> <p>20 Q. Okay. And I'm looking on 0_ -- or</p> <p>21 Lampo 519 --</p> <p>22 A. Yes.</p> <p>23 Q. -- video producer. It looks like that</p> <p>24 this was -- this document was created on</p> <p>25 3/8/17?</p>	<p style="text-align: right;">Page 17</p> <p>1 to 519?</p> <p>2 A. That's correct.</p> <p>3 Q. But look at these documents. You can't</p> <p>4 tell what day they were submitted on.</p> <p>5 A. No. There was different documents turned</p> <p>6 over in discovery that actually showed the date</p> <p>7 that he -- that Mr. Amos would have applied for</p> <p>8 these roles and the disposition of those</p> <p>9 applications.</p> <p>10 Q. Okay. All right. Well, let's flip back</p> <p>11 to LAMPO_509, which is the first page in</p> <p>12 Exhibit No. 3.</p> <p>13 Now, this -- can you look at this</p> <p>14 document and tell me when this was filled out?</p> <p>15 A. Yeah. That would be on May 16th, 2019,</p> <p>16 is the evaluation by Kimberly Rudolph, who</p> <p>17 would have been the recruiter working that</p> <p>18 requisition. And these would be her notes on</p> <p>19 the -- what we would call an HR screen --</p> <p>20 HR Zoom Screen.</p> <p>21 Q. Okay. And would these documents, this</p> <p>22 HR Zoom Screen, would they be -- would you have</p> <p>23 these same documents for each of the four jobs</p> <p>24 he applied for?</p> <p>25 A. If an HR Zoom Screen was -- took place,</p>

<p style="text-align: right;">Page 18</p> <p>1 yes. Sometimes they didn't take place. Some 2 of his dispositions he was turned down before 3 an HR Zoom Screen happened. 4 Q. Okay. Why would you be turned down 5 before a Zoom Screen happened? 6 A. Multitude of reasons. One of them could 7 be the amount that he was asking for was not -- 8 didn't line up with the position we had, the 9 experience didn't line up with what we needed 10 for that requisition, the background and 11 experience. It could have been all kinds of 12 different reasons. 13 Q. Okay. Do you know why when Mr. Amos 14 applied for the job of video producer, why he 15 did not get that job? 16 A. Without looking at the dispositions, I 17 can't tell you for sure. 18 Q. Okay. And is that the same for the 19 associate creative director position as well? 20 A. That would be correct. 21 Q. And the same for video producer, the 22 first time he applied for video producer, it 23 looks like? Or second time. 24 A. Yeah. So to give you accurate 25 information, yes, I would have to look at</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Okay. So Kimberly Rudolph initially 2 said, when she first met Mr. Amos, said, "He's 3 our guy," I guess smiley face. 4 Do you see that at the top of Page 509? 5 A. I do. 6 Q. Okay. It says, "He" -- do you see the 7 next paragraph? "He's all set to move here 8 from Cal with the family. This is home for 9 him, and everything aligns. I think he would 10 be the right person to help guide the team." 11 And next thing you say, "He is a 12 culture?" 13 What does that mean, "He is a culture"? 14 A. Speaking on behalf of the company, I 15 cannot answer that question. I don't know how 16 Kimberly would have interpreted that. 17 Q. Okay. Could it mean he's a cultural fit 18 for the job? 19 A. That would be my guess, but it would be a 20 guess. 21 Q. Okay. Does Ramsey require candidates to 22 be a cultural fit in order to be employed? 23 A. Yes and no. So cultural means they align 24 with the team, they follow our principles of 25 money handling.</p>
<p style="text-align: right;">Page 19</p> <p>1 the -- the disposition reasons -- 2 Q. Okay. 3 A. -- for each one of these reqs. 4 Q. Okay. But he was hired eventually as a 5 senior video editor? 6 A. That is correct. 7 Q. Okay. Do you see on Page 509, the first 8 page, do you see this line says, "We discussed 9 his position would [sic] be a leadership 10 position, but I can see him building great 11 partnerships with the team and his clients." 12 Do you see that? 13 A. Can you read that again, please? 14 Q. Sure. It's towards the bottom of the 15 page. 16 A. Uh-huh. 17 Q. "We discussed that this position wouldn't 18 be a leadership position, but I can see him 19 building great partnerships with the team and 20 his clients." 21 A. Yes, sir, I see that. 22 Q. Okay. Who would have put that into the 23 system? 24 A. All of the notes listed on this page are 25 from Kimberly Rudolph.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. Okay. 2 A. And so my guess is that's what she meant 3 with that. Because the following, if you read 4 through it, "He is a culture and debt free with 5 the exception of his home." 6 Q. Okay. And then she says, "He is humble." 7 What do you mean when you say, "He is 8 humble"? 9 A. We interview following Ideal Team Player 10 by Patrick Lencioni. It's a book. 11 Q. I'm sorry. What is that? Ideal Team -- 12 A. Team Player. It's a book by Patrick 13 Lencioni. 14 Q. Can you spell that last name? 15 A. L-E-N-C-C-I-O-N-I [sic]. 16 Q. Okay. 17 A. And in that book, Mr. Lencioni speaks 18 about an ideal team player is someone who is 19 humble, hungry, and smart, and he goes on to 20 identify those three characteristics. 21 Q. Okay. When you say "humble," what is -- 22 what does -- what is an employee that makes him 23 humble in Lampo's views? 24 A. Somebody willing to be a team player and 25 not take all the credit for themselves, be</p>

<p style="text-align: right;">Page 22</p> <p>1 willing to give credit to others. Even though</p> <p>2 they're -- they may be a subject matter expert,</p> <p>3 hold things openhandedly and take advice from</p> <p>4 others.</p> <p>5 Q. Follow orders?</p> <p>6 A. Follow orders would fall under humble,</p> <p>7 yes.</p> <p>8 Q. All right. What else would fall under</p> <p>9 humble besides what you told me today?</p> <p>10 A. I think one of the best definitions that</p> <p>11 I've heard for humility is not thinking too</p> <p>12 much of yourself.</p> <p>13 Q. And okay. Like in a work aspect, like</p> <p>14 working at Lampo, what would be considered an</p> <p>15 employee thinking too much about themselves?</p> <p>16 What kind of activities would indicate</p> <p>17 that would -- that would be an issue?</p> <p>18 A. It would be someone who would walk in to,</p> <p>19 say, a collaborative meeting but felt like</p> <p>20 their answer was the only correct answer and</p> <p>21 would not be willing to take constructive</p> <p>22 criticism, take advice from others, think of a</p> <p>23 possible alternative way to resolve a problem</p> <p>24 or an issue.</p> <p>25 Q. Okay. Anything -- another example you</p>	<p style="text-align: right;">Page 24</p> <p>1 BY MR. STREET:</p> <p>2 Q. Entre?</p> <p>3 A. EntreLeadership; Who Moved My Cheese.</p> <p>4 Q. Okay.</p> <p>5 A. The Monk and the Merchant; The Go-Getter.</p> <p>6 Q. Okay.</p> <p>7 A. How many is that?</p> <p>8 Q. That was six. I can read them off for</p> <p>9 you, if you want.</p> <p>10 A. The Go-Giver is the seventh one.</p> <p>11 Q. The Go-Getter and The Go-Giver?</p> <p>12 A. Correct.</p> <p>13 Q. All right. Who wrote Total Money</p> <p>14 Makeover?</p> <p>15 A. That would be Dave Ramsey.</p> <p>16 Q. Okay. What with about EntreLeadership?</p> <p>17 A. Dave Ramsey.</p> <p>18 Q. Okay. Who Moved My Cheese?</p> <p>19 A. I don't know the author. It's not Dave</p> <p>20 Ramsey.</p> <p>21 Q. All right. What is that book about?</p> <p>22 A. It's about dealing with change. It's</p> <p>23 about the ability to cope and understand that</p> <p>24 change is a necessary part of life.</p> <p>25 Q. Okay. The Monk and the -- I'm sorry. I</p>
<p style="text-align: right;">Page 23</p> <p>1 can think of?</p> <p>2 A. Not that I can think of.</p> <p>3 Q. Is this book, The Ideal Team Player, is</p> <p>4 that required reading by anyone who does hiring</p> <p>5 at Lampo?</p> <p>6 A. It is. It's required reading for all</p> <p>7 team members including those who hire.</p> <p>8 Q. It's required for all team -- I'm sorry.</p> <p>9 What did you call them?</p> <p>10 A. All team members.</p> <p>11 Q. All team members.</p> <p>12 A. So anyone that works at Ramsey would be</p> <p>13 required to read that book.</p> <p>14 Q. While we're here, what are all the</p> <p>15 required readings of a -- for a Lampo team</p> <p>16 member? Ideal Team Player is one, you told me.</p> <p>17 A. Yes.</p> <p>18 MS. SANDERS: Objection. Objection,</p> <p>19 it's outside the scope of the notice, but he</p> <p>20 may answer if he knows.</p> <p>21 THE WITNESS: So there are seven</p> <p>22 required readings. Ideal Team Player is one of</p> <p>23 them; Total Money Makeover is another one;</p> <p>24 EntreLeadership is a third one.</p> <p>25</p>	<p style="text-align: right;">Page 25</p> <p>1 can't read my own handwriting.</p> <p>2 A. The Monk and the Merchant.</p> <p>3 Q. The Monk and the Merchant. Thank you.</p> <p>4 Who wrote that?</p> <p>5 A. I'm not sure who the author is.</p> <p>6 Q. What's it about?</p> <p>7 A. It is about the relationship between</p> <p>8 businesses and supporting faith. So you don't</p> <p>9 have to be necessarily at church to be in</p> <p>10 ministry. You could support it by being in</p> <p>11 business and giving to ministry.</p> <p>12 Q. Okay. Is it a Christian book?</p> <p>13 A. No, not to my knowledge.</p> <p>14 Q. Okay. Is it written for Christians? Is</p> <p>15 it --</p> <p>16 A. No, not to my knowledge. It's not a</p> <p>17 Christian book or written for Christians. It's</p> <p>18 about the relationship between businesses and</p> <p>19 faith.</p> <p>20 Q. Okay. The Go-Getter?</p> <p>21 A. About perseverance and tenacity.</p> <p>22 Q. Who wrote that?</p> <p>23 A. I'm not sure.</p> <p>24 Q. And The Go-Giver?</p> <p>25 A. That ties a little bit to The Monk and</p>

<p style="text-align: right;">Page 26</p> <p>1 the Merchant. It's about the spirit of</p> <p>2 generosity, the spirit of giving.</p> <p>3 Q. Okay. And is this something you tell</p> <p>4 employees when they first come on; "We expect</p> <p>5 you to read these seven books"?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. Do you test them on it or</p> <p>8 anything?</p> <p>9 A. No.</p> <p>10 Q. The salary, looking at 509, looks like</p> <p>11 Mr. Amos was asking -- or the salary was going</p> <p>12 to be \$80,000?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. And is that what Mr. Amos ended up</p> <p>15 making when he first started with --</p> <p>16 A. No. He made 90,000.</p> <p>17 Q. Okay.</p> <p>18 A. He was hired for 90,000.</p> <p>19 Q. Okay.</p> <p>20 A. The salary on that line on 509 would have</p> <p>21 been what Mr. Amos said to Kimberly on salary</p> <p>22 requested.</p> <p>23 Q. Okay. And if we go on to Page 511, the</p> <p>24 question -- again, this is -- this looks like</p> <p>25 maybe David DiCicco. Am I saying that name</p>	<p style="text-align: right;">Page 28</p> <p>1 humble. When it says "hungry," what does it</p> <p>2 mean in the book when it says "hungry"?</p> <p>3 A. Hungry would be drive and energy; someone</p> <p>4 who possesses drive and energy.</p> <p>5 Q. Can you give me specific examples of what</p> <p>6 it might be talking about?</p> <p>7 A. This is off Patrick Lencioni's book. As</p> <p>8 he describes it, it is not someone who only</p> <p>9 speaks about getting things done; it is someone</p> <p>10 who has a proven track record of getting things</p> <p>11 done; someone who still has a passion and a</p> <p>12 hunger for moving things ahead, moving his --</p> <p>13 his or her career ahead.</p> <p>14 Q. Is there anything else that -- or from</p> <p>15 the book that talks about being hungry?</p> <p>16 A. That's the gist of what hungry means.</p> <p>17 Q. Okay. And I just want to make sure, I</p> <p>18 don't want to keep harping on it, but as far as</p> <p>19 the book talks about being humble, have we</p> <p>20 talked about everything the book says about</p> <p>21 being humble?</p> <p>22 A. I believe we have. I think we've talked</p> <p>23 about being collaborative, I think we've talked</p> <p>24 about being open to other people's ideas,</p> <p>25 not -- even if you're a subject matter expert,</p>
<p style="text-align: right;">Page 27</p> <p>1 right?</p> <p>2 A. Correct.</p> <p>3 Q. Is he the one who's inputting this data</p> <p>4 here?</p> <p>5 A. He would be. This is his evaluation --</p> <p>6 Q. Okay.</p> <p>7 A. -- of Mr. Amos.</p> <p>8 Q. And you -- and Mr. DiCicco says that Brad</p> <p>9 is "definitely an ideal team player."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. What did he mean when he said he</p> <p>13 is an "ideal team player"?</p> <p>14 A. Goes back to that book from Patrick</p> <p>15 Lencioni.</p> <p>16 Q. Okay.</p> <p>17 A. So he would have been comparing him to</p> <p>18 that book and saying that, in his opinion,</p> <p>19 Mr. Amos would have been an "ideal team</p> <p>20 player."</p> <p>21 Q. Okay. What does the book say makes an</p> <p>22 "ideal team player"?</p> <p>23 A. Somebody who is humble, hungry, and</p> <p>24 smart.</p> <p>25 Q. All right. We talked a little bit about</p>	<p style="text-align: right;">Page 29</p> <p>1 being willing to listen to other ways of doing</p> <p>2 things.</p> <p>3 Q. Okay.</p> <p>4 A. Not thinking too much of yourself.</p> <p>5 Q. Okay. And what about smart means smart?</p> <p>6 A. It actually does not mean --</p> <p>7 Q. Okay. Good. I'm glad I asked it. What</p> <p>8 does it mean in the book?</p> <p>9 A. It's not IQ. It's people smart,</p> <p>10 relational smarts. It is the ability to have</p> <p>11 self-awareness of how you're coming across and</p> <p>12 how you're leaving or entering a room with</p> <p>13 other people present.</p> <p>14 Q. Okay. All right. And then going on this</p> <p>15 page, 511, Mr. DiCicco, he also goes on and</p> <p>16 says "He is passionate about our mission."</p> <p>17 What mission is he talking about?</p> <p>18 A. That would be our Ramsey Solutions</p> <p>19 mission statement.</p> <p>20 Q. All right. I'm sure we have that here</p> <p>21 somewhere, but can you tell me in your own</p> <p>22 words what that says?</p> <p>23 A. Sure. We exist to provide biblically</p> <p>24 based education and empowerment that provide</p> <p>25 hope to everyone in every walk of life.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q. Okay. And to be a team player, would a 2 person need to follow the Ramsey mission 3 statement?</p> <p>4 A. Yes. To be hired, someone would follow 5 our mission statement and be passionate for it. 6 That's not in Patrick Lencioni's book. So it's 7 not to be an ideal team player, but to be a 8 team member, someone would need to be 9 passionate about what we do.</p> <p>10 Q. Okay. It says, "He offers a lot more 11 than just the editor role."</p> <p>12 What more did he offer besides the editor 13 role?</p> <p>14 A. I don't have the answer to that. This 15 was Mr. DiCicco's notes. My guess would be 16 that there's something in his background 17 experience.</p> <p>18 Q. Okay. It looks like Mr. DiCicco after -- 19 did he make these notes after speaking with 20 Mr. Amos?</p> <p>21 A. That's our normal process, yes.</p> <p>22 Q. Okay. And he thought that Mr. Amos was 23 absolutely a candidate fit for Ramsey Solutions 24 according to this document?</p> <p>25 A. Yes, that's how he answered this</p>	<p style="text-align: right;">Page 32</p> <p>1 The first one, being on Page 509, it says 2 "Evaluations for HR Zoom Screen." What is 3 that? What is the HR Zoom Screen?</p> <p>4 A. That's the first interview that a 5 recruiter would have with a candidate.</p> <p>6 Q. Okay. And then -- so after he 7 interviewed with Ms. Rudolph at his HR Zoom 8 Screen, he's then passed on to Mr. DiCicco for 9 a leader interview?</p> <p>10 A. That's correct.</p> <p>11 Q. That's the second step?</p> <p>12 A. Correct.</p> <p>13 Q. All right. And the third step is a third 14 interview, correct? It's a completely separate 15 interview?</p> <p>16 A. Uh-huh, yes.</p> <p>17 Q. And I'm sorry.</p> <p>18 A. That's okay.</p> <p>19 Q. Okay. When you say -- she's trying to 20 write down "yes" and "no" --</p> <p>21 A. Yes.</p> <p>22 Q. -- so "uh-huhs" and "uh-uhs" get 23 confused. They mean fairly different things, 24 so -- and I'm -- I'm not fussing because I do 25 it all the time, too.</p>
<p style="text-align: right;">Page 31</p> <p>1 question.</p> <p>2 Q. All right. And let's look at 512, that 3 also -- let's make sure -- this also appears to 4 be from Mr. DiCicco?</p> <p>5 A. Yes. They're different interviews. 6 So -- but, yes, that's also noted by 7 Mr. DiCicco.</p> <p>8 Q. They're different interviews?</p> <p>9 A. Yes. So at the top on Page 511, it says 10 "Evaluation for Leader Interview 2." This 11 would have been the second interview for the 12 hiring leader. And then it says "DISC," 13 meaning that by that point, we would have had 14 the DISC profile on the person.</p> <p>15 And then on 512, if you look at the top, 16 it's Evaluation for Compensation Discussion. 17 So this would have been the discussion that 18 covered the compensation and benefits with 19 Mr. Amos.</p> <p>20 Q. Okay. But these interviews would have 21 been with Mr. Amos himself?</p> <p>22 A. Correct.</p> <p>23 Q. All right. And the first -- and let's go 24 back, and I'm going -- thanks for telling me 25 that.</p>	<p style="text-align: right;">Page 33</p> <p>1 So, anyway, this is the third separate 2 interview, Brad Amos for compensation?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Is the wife involved? Would a 5 person's wife be involved in this third 6 interview?</p> <p>7 A. No.</p> <p>8 Q. Okay. I'm confused by his comment. He 9 says, "Let's get him in here! His wife is 10 confused about the opportunity and being back 11 in Tennessee as well."</p> <p>12 A. That would have been a comment probably 13 by Mr. Amos to Mr. DiCicco.</p> <p>14 Q. Okay. And, again, Mr. DiCicco feels that 15 Mr. Amos is definitely a candidate for Ramsey 16 Solutions?</p> <p>17 A. Correct. That's how he answered the 18 question.</p> <p>19 Q. Okay. And then the next page, 513, this 20 is an "Evaluation for Final On-Site Interview & 21 Spousal." Is this another interview?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And this -- what is a -- what is a 24 Final On-Site Interview & Spousal?</p> <p>25 A. The final on-site is the last set of</p>

<p style="text-align: right;">Page 34</p> <p>1 interviews that happen at our facility. So</p> <p>2 that would be when the candidate comes on-site.</p> <p>3 Spousal is that night they'll go have</p> <p>4 dinner together, and so this is the evaluations</p> <p>5 for those two things.</p> <p>6 Q. Okay. And these were -- looks like</p> <p>7 these -- these comments were typed in by -- the</p> <p>8 first comments on top were typed in by Luke</p> <p>9 LeFevre?</p> <p>10 A. LeFevre.</p> <p>11 Q. LeFevre.</p> <p>12 And Mr. LeFevre says, "Is the candidate a</p> <p>13 fit for Ramsey Solutions?"</p> <p>14 He says he "needs to get some corporate</p> <p>15 off of him, but he will be good."</p> <p>16 What does he mean when he says he "needs</p> <p>17 to get some corporate off of him"?</p> <p>18 A. Not -- not sure what Luke LeFevre meant</p> <p>19 by that comment, so --</p> <p>20 Q. Okay. And I'm looking on, for the</p> <p>21 record, on Page 513, LAMPO_513. In the second</p> <p>22 paragraph, you see where it's -- it looks like</p> <p>23 this was created by Mr. Rick Perry; is that</p> <p>24 correct?</p> <p>25 A. That is correct.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. In what way is it more elaborate?</p> <p>2 A. It defines kind of what winning would</p> <p>3 look like in that role.</p> <p>4 Q. Okay. And was there an actual KRA</p> <p>5 written up for Mr. Amos?</p> <p>6 A. There was.</p> <p>7 Q. And the last sentence says, "Ok to</p> <p>8 proceed if team/leader chemistry is a fit and</p> <p>9 conversation with his spouse re: the move" --</p> <p>10 "re: the move and comp align."</p> <p>11 So what does he mean when he says that?</p> <p>12 A. So what he's meaning is okay to proceed</p> <p>13 if the team/leader chemistry is a fit. So he</p> <p>14 may be feeling like there may be something</p> <p>15 there that rubbed Rick the wrong way perhaps.</p> <p>16 It might be that, Hey, we probably need to make</p> <p>17 sure that that chemistry with the team is okay.</p> <p>18 He might have felt there's something there that</p> <p>19 might not make him an ideal team player.</p> <p>20 And then going on, he says in the</p> <p>21 conversation with his spouse regarding the move</p> <p>22 and comp alignment, again, it's Rick trying to</p> <p>23 say, "Hey, let's make sure everything lines</p> <p>24 up."</p> <p>25 Q. Okay. And did everything line up in the</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. If you look at the second sentence there,</p> <p>2 it says, "An extremely talented candidate that</p> <p>3 will need to be on a fast track re:</p> <p>4 contributing."</p> <p>5 What does that mean, "fast track re:</p> <p>6 contributing"?</p> <p>7 A. The comment there by Rick would mean that</p> <p>8 he felt he was very talented, but he would need</p> <p>9 to be contributing quickly. He follows that up</p> <p>10 regarding contributing, i.e., his "key results</p> <p>11 area needs to challenge his strengths quickly</p> <p>12 and often."</p> <p>13 So I believe what he meant by that is</p> <p>14 saying that this individual is going to be</p> <p>15 bored if we don't challenge him and give him</p> <p>16 something where he can contribute.</p> <p>17 Q. Okay. What is the -- what is KR -- key</p> <p>18 results area I think you called it?</p> <p>19 A. Yes.</p> <p>20 Q. What does that mean?</p> <p>21 A. That would be his job description, if you</p> <p>22 will, what's expected of him.</p> <p>23 Q. Okay. So a KRA is a job description?</p> <p>24 A. Yes. It's a little more elaborate, but</p> <p>25 yes.</p>	<p style="text-align: right;">Page 37</p> <p>1 case of Mr. Amos?</p> <p>2 A. The offer was extended, so obviously</p> <p>3 somebody felt that it did to extend him that</p> <p>4 offer.</p> <p>5 Q. Who made the ultimate decision to extend</p> <p>6 Mr. Amos that offer?</p> <p>7 A. That would have been David DiCicco.</p> <p>8 Q. Okay. If you look on Page 514, these</p> <p>9 look just like some messages back and forth</p> <p>10 from Katie Price and Mark Mozingo?</p> <p>11 A. Yes.</p> <p>12 Q. Who are Katie Price and Mark Mozingo?</p> <p>13 A. So Katie Price at that time was our</p> <p>14 recruiting coordinator that coordinated all of</p> <p>15 the flights, car rentals, hotels for any</p> <p>16 candidate that was coming in from out of town.</p> <p>17 Q. Okay. And Mark Mozingo?</p> <p>18 A. And Mark Mozingo is our compliance</p> <p>19 specialist. So he runs all of our background</p> <p>20 checks. So he would have initiated the</p> <p>21 background check for Mr. Amos.</p> <p>22 Q. Okay. So we kind of went through the</p> <p>23 pages there, but I want to speak to actually in</p> <p>24 the case of Mr. Amos, what was it about him</p> <p>25 particularly that made you feel like he was</p>

<p style="text-align: right;">Page 38</p> <p>1 well-suited for this position, you being Lampo?</p> <p>2 A. Right.</p> <p>3 It would have been a combination of his</p> <p>4 background, experience, and the interview</p> <p>5 process.</p> <p>6 Q. Okay. And you felt like he did well on</p> <p>7 both, fit both?</p> <p>8 A. He had background experience and did well</p> <p>9 enough through the interview process.</p> <p>10 Q. Was there anything in the interview</p> <p>11 process with Mr. Amos that gave you pause?</p> <p>12 A. There was. In our notes, there was some</p> <p>13 concern about his ability to have enough</p> <p>14 humility.</p> <p>15 Q. What was it about him that gave you that</p> <p>16 concern?</p> <p>17 A. He was overly talkative, and he did a lot</p> <p>18 of name-dropping, which caused us to think that</p> <p>19 there might have been something there. It</p> <p>20 required an additional interview that was had</p> <p>21 with him to clarify that.</p> <p>22 Q. What name-dropping? What was he doing?</p> <p>23 A. There's a difference in talking about</p> <p>24 people you've worked with, and the way the</p> <p>25 interviewer took it is that he was dropping</p>	<p style="text-align: right;">Page 40</p> <p>1 people from, whether it be Phoenix or</p> <p>2 Washington or California, where in a short time</p> <p>3 of being with us, they got homesick and wanted</p> <p>4 to move back out West. So we were trying to</p> <p>5 make sure that that was not the case.</p> <p>6 Q. Okay. So the -- besides the humility</p> <p>7 concerns, which you mentioned, and the concern</p> <p>8 about him being from -- moving from out West,</p> <p>9 was there anything else that gave you pause</p> <p>10 prior to hiring Mr. Amos?</p> <p>11 A. Not from what was documented or from what</p> <p>12 I could see.</p> <p>13 Q. When you say he was name-dropping, do you</p> <p>14 remember the names he was dropping? I mean,</p> <p>15 just --</p> <p>16 A. No. And they're not listed. It was a</p> <p>17 comment made by someone in the discovery</p> <p>18 documents that said he appeared to be</p> <p>19 name-dropping. So they didn't list the names.</p> <p>20 Q. Okay. Was it an interviewer who said</p> <p>21 that?</p> <p>22 A. Yes.</p> <p>23 Q. What about Mr. Amos's experience did</p> <p>24 Lampo like prior to hiring him?</p> <p>25 A. Specifically?</p>
<p style="text-align: right;">Page 39</p> <p>1 names, not necessarily people he's worked with</p> <p>2 or projects he's worked on, but dropping names</p> <p>3 to elevate himself, and we were trying to make</p> <p>4 sure that that it wasn't a lack of humility, if</p> <p>5 you will.</p> <p>6 Q. Okay. Was there anything else besides</p> <p>7 the fact he was overly talkative and was</p> <p>8 name-dropping that made you feel like he may</p> <p>9 not have the humility to work at Lampo?</p> <p>10 A. From a humility standpoint, at that time</p> <p>11 through the interview process, no.</p> <p>12 Q. Okay. Was there any other reason besides</p> <p>13 the humility standpoint that you thought he</p> <p>14 might not be a good fit?</p> <p>15 A. The only other thing is something that we</p> <p>16 were struggling with or dealing with at that</p> <p>17 time, and that is that hiring people from out</p> <p>18 West was not very successful for us. People</p> <p>19 that moved that far away from their family were</p> <p>20 usually -- we took extra precaution to make</p> <p>21 sure that the spouse was on board, signed up,</p> <p>22 and ready to make that kind of move.</p> <p>23 Q. So you said you had bad luck with people</p> <p>24 out West -- hiring people out West before?</p> <p>25 A. Yes. We had -- we had hired a series of</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. Yes.</p> <p>2 A. My guess would be his video editing</p> <p>3 skills because that's the position he was being</p> <p>4 hired for.</p> <p>5 Q. Okay. And the experience he had in that</p> <p>6 area?</p> <p>7 A. Yes.</p> <p>8 Q. The reason I'm asking is because you</p> <p>9 said that it was -- what made him a good fit,</p> <p>10 you had mentioned his experience?</p> <p>11 A. Right.</p> <p>12 Q. And I'm not putting words in your mouth,</p> <p>13 so correct me if I'm wrong. I think you said</p> <p>14 that it was his experience and --</p> <p>15 A. Background and experience.</p> <p>16 Q. Okay.</p> <p>17 A. And obviously how he did in the</p> <p>18 interviews.</p> <p>19 Q. Okay. So you said his experience as a</p> <p>20 video editor, and you said his background.</p> <p>21 What about his background made him an ideal fit</p> <p>22 in Lampo's view?</p> <p>23 A. That would have been -- it ties together.</p> <p>24 So the background and experience is what he's</p> <p>25 done before and how fast or slow that he has</p>

<p style="text-align: right;">Page 42</p> <p>1 elevated what he shows or demonstrates his</p> <p>2 passions are in that area, and then how much</p> <p>3 time he spent in that area, the experience, the</p> <p>4 types of projects he's worked on, et cetera.</p> <p>5 Q. Okay. But the background wouldn't be</p> <p>6 dealing with these things from the book you</p> <p>7 were telling me; the humble-hungry-smart?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. What investigations, if any, did</p> <p>10 Lampo do prior -- into Mr. Amos prior to hiring</p> <p>11 him?</p> <p>12 A. We don't do an investigation prior to</p> <p>13 hiring somebody.</p> <p>14 Q. You do a background check?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And when I say "investigation," I</p> <p>17 mean -- that's what I'm talking about, any kind</p> <p>18 of a check, something like that.</p> <p>19 A. We would have done a background check and</p> <p>20 reference checks.</p> <p>21 Q. Okay. And that's it?</p> <p>22 A. Correct.</p> <p>23 Q. And there was nothing in his background</p> <p>24 check or checking his reference that made you</p> <p>25 think he would not be a good candidate?</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Yes.</p> <p>2 Q. -- at the office and a computer for him</p> <p>3 to use?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Is it possible he could have done this</p> <p>6 job at his house?</p> <p>7 A. The video files are so large that they</p> <p>8 really sit on our servers at the office.</p> <p>9 Q. Okay. Could he access them online, the</p> <p>10 video files?</p> <p>11 A. I do not believe so. I don't believe --</p> <p>12 he could access them, yes; I don't believe that</p> <p>13 he could do his job of editing remotely. I</p> <p>14 believe to manage the files and change the</p> <p>15 files, I believe you have to be on the server.</p> <p>16 Q. Okay. But that's not something he could</p> <p>17 log in to the server from another location to</p> <p>18 perform?</p> <p>19 A. Not to my knowledge.</p> <p>20 Q. Is the server connected to his computer</p> <p>21 directly at the office, the server with the</p> <p>22 large video files?</p> <p>23 A. He would connect directly to it, yes.</p> <p>24 It's not a cloud-based server, if that's your</p> <p>25 question.</p>
<p style="text-align: right;">Page 43</p> <p>1 A. Correct.</p> <p>2 Q. As a senior video editor, what were</p> <p>3 Mr. Amos's job duties?</p> <p>4 A. Specifically, to edit video. So</p> <p>5 different video, different types of video that</p> <p>6 we produce, whether that be for a conference or</p> <p>7 internal videos that are being utilized for a</p> <p>8 staff meeting.</p> <p>9 Q. Okay. Do you remember the particular</p> <p>10 videos Mr. Amos was brought on to work on?</p> <p>11 A. There's a series. We don't necessarily</p> <p>12 hire someone with one particular editing video</p> <p>13 in mind. So we would have brought him on to</p> <p>14 edit video. And I know at that time when he</p> <p>15 came on we were contemplating a documentary,</p> <p>16 but we were not there yet.</p> <p>17 Q. What was going to be the subject of the</p> <p>18 documentary?</p> <p>19 A. The subject would have been loans --</p> <p>20 college loans.</p> <p>21 Q. School debt?</p> <p>22 A. Uh-huh.</p> <p>23 Q. So when Mr. Amos -- you say his job was</p> <p>24 to -- as a video editor was to edit video. Did</p> <p>25 you have the software there for him to use --</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. Yes, I guess it was. Thank you.</p> <p>2 Who did Mr. Amos answer to while working</p> <p>3 at Lampo Group?</p> <p>4 A. In his time there, he answered to two</p> <p>5 different people. I believe he started with</p> <p>6 David DiCicco.</p> <p>7 Q. What's Mr. DiCicco's job title? Or was</p> <p>8 his job title.</p> <p>9 A. I don't know without looking at it.</p> <p>10 Q. Is Mr. DiCicco still with --</p> <p>11 A. Yes, he is.</p> <p>12 Q. Okay. You said there was two. One was</p> <p>13 David DiCicco?</p> <p>14 A. Right. And the second one was Lara</p> <p>15 Johnson.</p> <p>16 Q. And is Ms. Johnson still with Ramsey?</p> <p>17 A. Yes, she is.</p> <p>18 Q. Or she's with Lampo.</p> <p>19 And what was her job title at the time?</p> <p>20 A. She was over the video team. She might</p> <p>21 have been a director or senior director.</p> <p>22 Q. Now, plaintiff -- do you remember the day</p> <p>23 plaintiff started for Lampo?</p> <p>24 A. No, sir.</p> <p>25 Q. Okay. And when he started, were there</p>

<p style="text-align: right;">Page 46</p> <p>1 any issues with his work right off the bat?</p> <p>2 A. Not to my knowledge.</p> <p>3 Q. Okay. Were there ever any issues with</p> <p>4 plaintiff's work as a video director --</p> <p>5 A. There were --</p> <p>6 Q. -- video editor?</p> <p>7 A. -- yes.</p> <p>8 Q. What were those issues?</p> <p>9 A. Those issues were outlined in an e-mail</p> <p>10 by Mr. David DiCicco to Mr. Brad Amos where it</p> <p>11 was a combination of missing deadlines and a</p> <p>12 lack of communication back to Mr. DiCicco</p> <p>13 stating that they were going to miss those</p> <p>14 deadlines.</p> <p>15 Q. Okay. And are those the only two issues?</p> <p>16 A. There were more that transpired after</p> <p>17 that. That was the first one. And then</p> <p>18 there's additional e-mails where Lara Johnson</p> <p>19 brought up some performance issues with him and</p> <p>20 his ability to do work quickly.</p> <p>21 Q. Okay. And there was an issue -- you said</p> <p>22 he was late with Lara Johnson and a performance</p> <p>23 issue. Was this before or after the e-mail was</p> <p>24 between -- you said it was DiCicco, I think?</p> <p>25 A. It was after.</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yeah.</p> <p>2 Q. -- we just need to figure where it is in</p> <p>3 the stack of documents lawyers carry around</p> <p>4 everywhere they go.</p> <p>5 MR. STREET: Let's take about five or ten</p> <p>6 while we flip through here.</p> <p>7 MS. SANDERS: Sure.</p> <p>8 MR. STREET: Won't keep everybody.</p> <p>9 MS. SANDERS: Do you want to -- do</p> <p>10 you want us to stay in here? Do you want us to</p> <p>11 leave? We can leave.</p> <p>12 MR. STREET: Yeah, if y'all don't</p> <p>13 mind, just for a second.</p> <p>14 MS. SANDERS: Yeah. Sure.</p> <p>15 MR. STREET: It being easier than us</p> <p>16 having to haul all this stuff.</p> <p>17 THE VIDEOGRAPHER: We are going off</p> <p>18 the record. The time on the video monitor is</p> <p>19 11:12 a.m.</p> <p>20 (Short break.)</p> <p>21 THE VIDEOGRAPHER: We are back on the</p> <p>22 record. The time is 11:26 a.m.</p> <p>23 MR. STREET: All right. Let's mark</p> <p>24 these as Exhibit No. 4.</p> <p>25 MS. SANDERS: Can I just see them</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. So DiCicco e-mail was first, then Lara</p> <p>2 Johnson e-mail was second?</p> <p>3 A. Correct.</p> <p>4 Q. And DiCicco's e-mail was about missing a</p> <p>5 deadline?</p> <p>6 A. That is correct.</p> <p>7 Q. Okay. And lack of communications. And</p> <p>8 then Lara Johnson's was about ability to do</p> <p>9 work quickly?</p> <p>10 A. It was about getting something done in</p> <p>11 time. I don't remember the specifics of that</p> <p>12 e-mail.</p> <p>13 Q. Okay. And did these -- were there any</p> <p>14 other issues with his particular work?</p> <p>15 A. Yes. There was, in the e-mail -- there</p> <p>16 was an e-mail as well by Luke LeFevre that</p> <p>17 outlined and summarized some of the issues that</p> <p>18 were going to be discussed with Mr. Amos.</p> <p>19 Q. Do you remember what they were?</p> <p>20 A. Not off the top.</p> <p>21 Q. Give me a second here. We'll see if we</p> <p>22 can't find it for you.</p> <p>23 A. Sure.</p> <p>24 Q. I'm not trying to trick you. Like I</p> <p>25 said --</p>	<p style="text-align: right;">Page 49</p> <p>1 before?</p> <p>2 MR. STREET: Sure.</p> <p>3 MS. SANDERS: So I can try to match</p> <p>4 them up.</p> <p>5</p> <p>6 (WHEREUPON, a document was marked as</p> <p>7 Exhibit 4.)</p> <p>8 MS. SANDERS: Okay. If you'll just</p> <p>9 give me the date of the e-mail as you're going,</p> <p>10 I'll try to match it up.</p> <p>11 MR. STREET: Okay. Sure.</p> <p>12 BY MR. STREET:</p> <p>13 Q. All right. If you'll look at those, do</p> <p>14 you recognize these documents I've handed you?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And what are those documents?</p> <p>17 A. These are e-mail exchanges between -- I'm</p> <p>18 only looking at the first page, and that one is</p> <p>19 a conversation between David DiCicco and Luke</p> <p>20 LeFevre.</p> <p>21 Q. They're e-mail exchanges between</p> <p>22 employees of Lampo?</p> <p>23 A. That would be correct.</p> <p>24 Q. All right. Well, let's look at the first</p> <p>25 page. And this is an e-mail dated Tuesday,</p>

<p style="text-align: right;">Page 50</p> <p>1 April 7, 2020. And this appears to be an</p> <p>2 e-mail from DiCicco to Luke LeFevre. Am I</p> <p>3 saying it -- LeFevre?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. It looks like Mr. DiCicco is</p> <p>6 talking about something he wanted to</p> <p>7 communicate to Brad. Do you see that?</p> <p>8 A. I see that.</p> <p>9 Q. Why would Mr. DiCicco have sent this to</p> <p>10 Mr. LeFevre instead of just talking to Brad</p> <p>11 himself?</p> <p>12 A. David DiCicco reported to Luke LeFevre.</p> <p>13 What this appears to be is, "Hey, I need your</p> <p>14 advice. I need your help. I'm about to have</p> <p>15 this conversation. Can you guide me, lead me,</p> <p>16 provide your advice?"</p> <p>17 Q. Okay. And if you'll look at the second</p> <p>18 paragraph, it says, "I hope you understood my</p> <p>19 frustration back on March 6th when we talked</p> <p>20 about missing the 'Cards and Quotes' assembly</p> <p>21 edit screener deadline."</p> <p>22 What is the "Cards and Quotes" assembly</p> <p>23 edit screener?</p> <p>24 A. That is a great question. I'm guessing</p> <p>25 it's some kind of video thing that we did, but</p>	<p style="text-align: right;">Page 52</p> <p>1 documents we produced.</p> <p>2 Q. I'm sure we'll pull it up again today at</p> <p>3 some point.</p> <p>4 A. Okay.</p> <p>5 Q. But this is the one where -- did</p> <p>6 Mr. DiCicco or Mr. LeFevre discuss this before</p> <p>7 he sent this e-mail about issues they were</p> <p>8 having with Brad?</p> <p>9 A. I don't know that. It doesn't state that</p> <p>10 in this.</p> <p>11 Q. Okay. You don't know what led</p> <p>12 Mr. DiCicco to send this e-mail?</p> <p>13 A. I do not. My guess is that in a</p> <p>14 conversation with Luke LeFevre, he would have</p> <p>15 said, "Hey, I'm having issues." Luke would</p> <p>16 have advised him to say "Hey, document that,</p> <p>17 and let's go ahead and send him" -- "tell him</p> <p>18 what you're thinking," right? And then David</p> <p>19 would have sent this back to Luke saying, "This</p> <p>20 is what I would like to communicate."</p> <p>21 Q. And was this the first e-mail that you're</p> <p>22 aware of that Mr. DiCicco would have sent to</p> <p>23 Brad expressing a little bit of angst about his</p> <p>24 work?</p> <p>25 A. To my knowledge, yes.</p>
<p style="text-align: right;">Page 51</p> <p>1 I am not sure which one it is.</p> <p>2 Q. Okay. And this is apparently -- it looks</p> <p>3 this e-mail that he has -- do you see where</p> <p>4 it's in bold? It says, "This is what I want to</p> <p>5 communicate with Brad."</p> <p>6 A. Yes, sir.</p> <p>7 Q. And the following paragraphs look like</p> <p>8 what he is suggesting, correct me if I'm wrong,</p> <p>9 that DiCicco was telling LeFevre, "This is the</p> <p>10 e-mail I'm going to send to Brad"?</p> <p>11 A. That's right. That's what it reads like.</p> <p>12 Q. He's not saying it to LeFevre; he's</p> <p>13 saying this is what I would like to send to</p> <p>14 Brad Amos?</p> <p>15 A. This is what I would like to communicate</p> <p>16 to Brad Amos. Can you provide your input or</p> <p>17 insight or...</p> <p>18 Q. Okay.</p> <p>19 A. There is an actual other e-mail where he</p> <p>20 did communicate this to Brad via e-mail.</p> <p>21 Q. Okay. And it's this exact same e-mail?</p> <p>22 A. It's similar. I don't know if it's exact</p> <p>23 word for word.</p> <p>24 Q. Okay.</p> <p>25 A. But I do recall seeing it in the</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. All right. If you look at the next set</p> <p>2 of e-mails, it looks like it starts at 3/21/20</p> <p>3 on the top of the page, and it's a -- it's an</p> <p>4 e-mail string from before that. Do you see</p> <p>5 that?</p> <p>6 A. Yes, I see that.</p> <p>7 Q. The first one we're looking at backward</p> <p>8 appears to be from Lara Johnson to Luke LeFevre</p> <p>9 and Jen Sievertsen?</p> <p>10 A. Sievertsen, yeah.</p> <p>11 And that's -- so the first one at the top</p> <p>12 appears to be from Luke LeFevre to Lara Johnson</p> <p>13 and Jen Sievertsen.</p> <p>14 Q. Right, right. But I'm looking backwards</p> <p>15 because we're going by dates. You know how --</p> <p>16 A. Got it. Okay.</p> <p>17 Q. -- in a reply e-mail, the older ones come</p> <p>18 at the bottom?</p> <p>19 A. So you're at the bottom?</p> <p>20 Q. Right.</p> <p>21 All right. So I'm looking -- I'm asking</p> <p>22 about this one that was sent on Friday,</p> <p>23 March 20th, at 4:26. Do you see that?</p> <p>24 A. Yes, I see that.</p> <p>25 Q. And it was sent to Luke LeFevre and</p>

<p style="text-align: right;">Page 54</p> <p>1 Jen Sievertsen. Did I say that right?</p> <p>2 A. Yes.</p> <p>3 Q. And who is Jen Sievertsen?</p> <p>4 A. She is a board member. That would be who</p> <p>5 Luke LeFevre reported to.</p> <p>6 Q. Okay. And is being a board member there</p> <p>7 a full-time job at Lampo?</p> <p>8 A. Yes, it's a full-time job, but there's</p> <p>9 also -- she's our chief marketing officer as</p> <p>10 well. So a board member is not a position, per</p> <p>11 se.</p> <p>12 Q. Okay.</p> <p>13 A. She's the chief marketing officer, who</p> <p>14 also is a board member.</p> <p>15 Q. Okay. Who else is on the board?</p> <p>16 MS. SANDERS: Object, outside the</p> <p>17 scope. He can answer it.</p> <p>18 THE WITNESS: So Brendan Wovchko,</p> <p>19 he's the chief technology officer; Michael</p> <p>20 Finney, he's the chief operating officer; Susan</p> <p>21 Simms, she is over our business channels; Dave</p> <p>22 Ramsey; his son, Daniel Ramsey over</p> <p>23 EntreLeadership.</p> <p>24 There's 14 of them.</p> <p>25 Herb Jenkins. I don't have all 14</p>	<p style="text-align: right;">Page 56</p> <p>1 the COVID pandemic, did Mr. Ramsey keep</p> <p>2 a small -- or did Lampo, excuse me, keep a</p> <p>3 small team there at the -- at the actual</p> <p>4 office?</p> <p>5 A. There was a group of essential workers</p> <p>6 that stayed on to do the Dave Ramsey show.</p> <p>7 Q. Okay. And how did you interpret</p> <p>8 essential to determine they would be working</p> <p>9 there at the office?</p> <p>10 A. We followed Governor Lee's mandate for</p> <p>11 agencies that broadcast radio stations,</p> <p>12 et cetera.</p> <p>13 Q. Okay. And was there something particular</p> <p>14 about this group of people's job duties that</p> <p>15 made them essential?</p> <p>16 A. Yes. They would have been essential to</p> <p>17 being able to broadcast the radio show or</p> <p>18 YouTube channel or any of the other media</p> <p>19 outlets that we would serve.</p> <p>20 Q. Okay. What size crew did you have in the</p> <p>21 building for the video editors?</p> <p>22 A. I don't remember the size. It was a</p> <p>23 small group. It was a skeleton crew of team</p> <p>24 members. I don't remember the exact number.</p> <p>25 Q. Now, next paragraph says, "We are getting</p>
<p style="text-align: right;">Page 55</p> <p>1 memorized.</p> <p>2 God bless you.</p> <p>3 But I can pull that up if you like.</p> <p>4 BY MR. STREET:</p> <p>5 Q. That's okay. I just wondered.</p> <p>6 But looking at her e-mail from</p> <p>7 March 20th -- and March 20th, 2020, fair to</p> <p>8 say, this is about the same time COVID was just</p> <p>9 getting started up --</p> <p>10 A. Uh-huh.</p> <p>11 Q. -- correct?</p> <p>12 A. That's correct.</p> <p>13 Q. All right. So we're looking at this from</p> <p>14 Lara Johnson, and it says, "It is difficult for</p> <p>15 our team to work from home since so much of it</p> <p>16 is hands-on activity."</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. And it says, "We think we can keep the</p> <p>20 team moving forward on projects and production</p> <p>21 if we can make things" -- "these things happen</p> <p>22 with a small crew here in the building for</p> <p>23 limited times."</p> <p>24 A. I see that.</p> <p>25 Q. And was that -- the entire time during</p>	<p style="text-align: right;">Page 57</p> <p>1 hard drives together for the editors to take</p> <p>2 home. These will be ready starting Monday, and</p> <p>3 we will release them as loaded. We will</p> <p>4 schedule these pick-ups next week and have</p> <p>5 their computers & hard drives ready from them</p> <p>6 to drive up and grab."</p> <p>7 Do you see that?</p> <p>8 A. I see that.</p> <p>9 Q. All right. So the files -- the video</p> <p>10 files, you were giving them to editors to take</p> <p>11 home to work on them?</p> <p>12 A. The hard drives did not hold all of the</p> <p>13 video files. They just held portions of them.</p> <p>14 So we were trying to give them enough to do</p> <p>15 while we were working from home.</p> <p>16 Q. Okay. So you gave them hard drives with</p> <p>17 material they needed to do their jobs from</p> <p>18 home?</p> <p>19 A. Correct.</p> <p>20 Q. How did you determine who would be</p> <p>21 working at the office and who would be able to</p> <p>22 work from home during this time period?</p> <p>23 A. We asked for volunteers, and so we said,</p> <p>24 "Hey, if you're okay coming in, this is what</p> <p>25 we're going to be doing." And, again, this</p>

<p style="text-align: right;">Page 58</p> <p>1 were people that were directly involved with</p> <p>2 the radio show, YouTube channel, things where</p> <p>3 we would be broadcasting for the radio show</p> <p>4 mostly. And so we asked for volunteers to --</p> <p>5 that would be comfortable coming in during that</p> <p>6 time period.</p> <p>7 Q. Okay. Mr. Amos was not one of these</p> <p>8 volunteers?</p> <p>9 A. Mr. Amos was one of them. I believe</p> <p>10 somewhere in this stack is an e-mail from David</p> <p>11 DiCicco confirming that he is, in fact, okay</p> <p>12 coming in, and that if he's not, that that</p> <p>13 would be okay with us.</p> <p>14 Q. Okay. How many of the video producers</p> <p>15 chose to work from home?</p> <p>16 A. I don't know the answer to that question.</p> <p>17 Q. Who would know that?</p> <p>18 A. I don't know that anyone would. We</p> <p>19 didn't keep attendance during that time. And</p> <p>20 as you may recall in 2020 during that time,</p> <p>21 there were a lot of things up in the air with</p> <p>22 the pandemic.</p> <p>23 Q. When you said that -- when Lara Johnson</p> <p>24 says here that, "It is difficult for our team</p> <p>25 to work from home since so much of it is</p>	<p style="text-align: right;">Page 60</p> <p>1 know if we continue moving forward with these</p> <p>2 if we had a small crew to make them happen."</p> <p>3 Ramsey Education, is that a video, Ramsey</p> <p>4 Education?</p> <p>5 A. That's a department.</p> <p>6 Q. Okay. All right. Who is George and</p> <p>7 Hogan?</p> <p>8 A. The George referenced here would be</p> <p>9 George Kamel. Hogan would be Chris Hogan. And</p> <p>10 so it's listed "George, Hogan in the</p> <p>11 personalities room - March 25th." My guess is</p> <p>12 that's where they would do the video shoot.</p> <p>13 Q. Okay. And then the section is "PU Quick</p> <p>14 Pivot Ideas."</p> <p>15 A. Yeah. It's cut off with the hole punch.</p> <p>16 It should actually say FPU.</p> <p>17 Q. Okay.</p> <p>18 A. And so that would be Financial Piece</p> <p>19 University, Quick Pivot Ideas. "Dan Ram is</p> <p>20 working with Dave on these. To be shot in</p> <p>21 TDRS"; is The Dave Ramsey Show studio.</p> <p>22 Q. Who is Dan Ram?</p> <p>23 A. That would be Daniel Ramsey.</p> <p>24 Q. Okay. Is he related to Dave?</p> <p>25 A. He is.</p>
<p style="text-align: right;">Page 59</p> <p>1 hands-on activity," what is the hands-on</p> <p>2 activity required for the video editors?</p> <p>3 A. I'm sorry. Where are you at?</p> <p>4 Q. In the first sentence in this e-mail from</p> <p>5 Lara Johnson.</p> <p>6 A. "Wanted to run some thoughts by you."</p> <p>7 Q. Right.</p> <p>8 A. Okay. "...with the video team</p> <p>9 essentially shut down. It is difficult for our</p> <p>10 team" -- second sentence. Got it.</p> <p>11 That goes back to what we were talking</p> <p>12 about. So much is on our servers, that from an</p> <p>13 editing standpoint -- it's not cloud-based, so</p> <p>14 you're having to grab things from different</p> <p>15 places on the server in order to be able to</p> <p>16 edit, and then you must have certain software</p> <p>17 if you want to edit the sound as well, the</p> <p>18 audio, not just the video.</p> <p>19 Q. Okay. Well, what was on these hard</p> <p>20 drives you were passing out -- passing out?</p> <p>21 A. Small portions of that.</p> <p>22 Q. And then she says in the next page, if</p> <p>23 you look at the next page, this older e-mail,</p> <p>24 that you're going to have a few shoots</p> <p>25 scheduled in the next two weeks. "We wanted to</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. How?</p> <p>2 A. It's his son.</p> <p>3 Q. Entre Core Teaching, what is that?</p> <p>4 A. EntreLeadership is a department. It's --</p> <p>5 also happens to be a book, but it's a</p> <p>6 department, and during that time -- well, let</p> <p>7 me back up.</p> <p>8 We teach small businesses how to run</p> <p>9 their businesses the way that Dave ran his</p> <p>10 company when it started. And so there were a</p> <p>11 lot of small businesses, including -- we were</p> <p>12 not a small business but including us,</p> <p>13 wondering how do we -- how do we deal with a</p> <p>14 pandemic, how do we deal with -- mostly it was</p> <p>15 communication. So we were filming and putting</p> <p>16 something out for our clients on the core</p> <p>17 principles and -- and how to deal with</p> <p>18 uncertainty.</p> <p>19 Q. Those would be videos that you sold?</p> <p>20 A. Yes and no. So if you were part of an</p> <p>21 Entre All Access, you had access to them. So</p> <p>22 we weren't selling them individually. You were</p> <p>23 already a part of the Entre tribe, thus, you</p> <p>24 got this --</p> <p>25 Q. Subscription based?</p>

<p style="text-align: right;">Page 62</p> <p>1 A. -- content for free.</p> <p>2 Correct.</p> <p>3 Q. Okay. So people who subscribe could</p> <p>4 watch these videos?</p> <p>5 A. Yes.</p> <p>6 Q. What is SmartDollar?</p> <p>7 A. It's a business unit. So SmartDollar is</p> <p>8 where we teach small businesses how to get</p> <p>9 their employees out of debt.</p> <p>10 Q. Okay. And "AO - Product addiction" --</p> <p>11 "addition"? Excuse me.</p> <p>12 A. So AO stands for Anthony O'Neill, and so</p> <p>13 this was an Anthony O'Neill product addition</p> <p>14 that was being filmed. They're recommending on</p> <p>15 April 8th.</p> <p>16 Q. Who is Anthony?</p> <p>17 A. Anthony O'Neill was a personality with</p> <p>18 Ramsey Solutions.</p> <p>19 Q. And he would sell things?</p> <p>20 A. I'm sorry?</p> <p>21 Q. He would sell things, trinkets,</p> <p>22 souvenirs?</p> <p>23 A. No.</p> <p>24 Q. What would he sell?</p> <p>25 A. He would sell -- basically, he would have</p>	<p style="text-align: right;">Page 64</p> <p>1 people to do that -- that type of production.</p> <p>2 And she lists four names there. And then the</p> <p>3 documentary, we would need the following. She</p> <p>4 said we would love to keep it on schedule, and</p> <p>5 that's where David DiCicco and Brad Amos would</p> <p>6 be in Bluebird viewing room to continue to work</p> <p>7 through the edits.</p> <p>8 Q. Okay. What's the Bluebird viewing room?</p> <p>9 A. Bluebird is just the name of a screening</p> <p>10 room. It's an edit room where team members</p> <p>11 would go in to do their edits there. It's a</p> <p>12 bigger screen. It's, again, access to servers,</p> <p>13 et cetera.</p> <p>14 Q. Okay. So these projects listed, the only</p> <p>15 one that you mentioned Mr. Amos working on was</p> <p>16 the documentary?</p> <p>17 A. That's correct.</p> <p>18 Q. Okay. If you flip back to the page</p> <p>19 before, in an e-mail from Friday, March 20th,</p> <p>20 2020, from Jennifer Sievertsen, she says this</p> <p>21 plan -- she's okay with this plan, and they're</p> <p>22 doing a deep clean?</p> <p>23 A. Yeah. So "I'm good with this plan</p> <p>24 assuming the team is good to come in. You can</p> <p>25 let them know we're already deep cleaning,</p>
<p style="text-align: right;">Page 63</p> <p>1 content that talked to people about either, A,</p> <p>2 getting out of debt; B, think -- think</p> <p>3 interviews that he would do that would have an</p> <p>4 appeal to the public to hear what people have</p> <p>5 to say; motivational speaker.</p> <p>6 Q. Right. So --</p> <p>7 A. There -- there was no merchandising,</p> <p>8 there was no trinket, there wasn't a T-shirt or</p> <p>9 a cup or a glass.</p> <p>10 Q. Then she goes on and says, "Skeleton</p> <p>11 Crew, Daily, that there will be two people</p> <p>12 required in the building every day from the</p> <p>13 video production"?</p> <p>14 A. Yes. So this was part of that e-mail</p> <p>15 that we started with on the previous page. And</p> <p>16 so this is what Lara is saying her</p> <p>17 recommendation for the video shoots and then</p> <p>18 the skeleton crew that would be needed in order</p> <p>19 to make this work that she just finished</p> <p>20 listing happen. So she's saying daily, we</p> <p>21 would need the -- two individuals in order to</p> <p>22 be able to do this, and she outlines why each</p> <p>23 one is needed.</p> <p>24 And then if we did the productions that</p> <p>25 are scheduled, then we would need the following</p>	<p style="text-align: right;">Page 65</p> <p>1 again, the offices this weekend." So we were</p> <p>2 on a schedule of deep cleaning at this time.</p> <p>3 And so she's stating to Lara, "Hey, I'm</p> <p>4 good with this plan assuming that the team is</p> <p>5 good to come in, and let them know we're</p> <p>6 already deep cleaning again," meaning we would</p> <p>7 have already done it once at least, and that</p> <p>8 was scheduled to happen that weekend.</p> <p>9 Q. Okay. And then it looks like the next --</p> <p>10 next message in the string was sent from Luke</p> <p>11 LeFevre and included David DiCicco as copied as</p> <p>12 well, and this is, "Copying David. I am fine</p> <p>13 with most of this. I think we need to pause</p> <p>14 the doc for a week."</p> <p>15 Do you see that?</p> <p>16 A. I see that. But is that the next one or</p> <p>17 is the next one the one from Lara Johnson?</p> <p>18 Q. Oh, I guess you're right. There is one</p> <p>19 between there.</p> <p>20 A. Right.</p> <p>21 Q. So Lara Johnson --</p> <p>22 A. So Lara is replying to Jen Sievertsen</p> <p>23 saying that sounds good, yes, this is</p> <p>24 contingent on them, meaning the team, being</p> <p>25 okay.</p>

<p style="text-align: right;">Page 66</p> <p>1 Q. And that was on March 20th -- Friday</p> <p>2 March 20th. So on Saturday, March 21st, that's</p> <p>3 when Mr. LeFevre sent this mail saying he needs</p> <p>4 to put the pause -- need to pause the doc for a</p> <p>5 week?</p> <p>6 A. He's asking the question. So it looks</p> <p>7 like -- so if I read the whole thing, it says,</p> <p>8 "Copying David," that would be David DiCicco.</p> <p>9 "I'm fine with most of this. I think we need</p> <p>10 to pause the doc for a week. I am nervous</p> <p>11 about Brad Amos's wife doing something dumb if</p> <p>12 he comes in." And then he asks the question,</p> <p>13 "Can we pause for a week and see where we</p> <p>14 stand? Then check in with him?"</p> <p>15 Q. Check in with him being Brad Amos?</p> <p>16 A. That would be my guess.</p> <p>17 Q. Okay. Well, he says, "I am nervous about</p> <p>18 Brad Amos's wife doing something dumb if he</p> <p>19 comes in."</p> <p>20 What were they worried about Brad Amos's</p> <p>21 wife doing?</p> <p>22 A. I'm not sure. I am not sure what he's</p> <p>23 thinking about, but in further e-mails, we can</p> <p>24 see where Brad Amos's wife would not let him</p> <p>25 come into the house because he was at work and</p>	<p style="text-align: right;">Page 68</p> <p>1 A. Yes, sir.</p> <p>2 Q. This says, you know, "Luke and I talked</p> <p>3 and wanted to bring you up to speed on what we</p> <p>4 discussed. I want to start digging in with</p> <p>5 Brad and see if I can get some of that</p> <p>6 corporate thinking out of him."</p> <p>7 What does that mean, the "corporate</p> <p>8 thinking out of him"?</p> <p>9 A. I'm not sure what Lara meant by that.</p> <p>10 Q. So "I'm going to start meeting with him</p> <p>11 1:1."</p> <p>12 Do you see that?</p> <p>13 A. Yes, I see that. So I'm going to start</p> <p>14 meeting with him one-on-one. So we do</p> <p>15 one-on-ones with team members on a weekly</p> <p>16 basis. My guess is she's saying I'm going to</p> <p>17 start having one-on-ones with him weekly.</p> <p>18 Q. Because she didn't like the way he was</p> <p>19 thinking?</p> <p>20 A. Perhaps. Again, I'm not sure what she</p> <p>21 meant by "corporate thinking." There must have</p> <p>22 been something that she said or done that</p> <p>23 caused her to think, "Hey, let's figure out</p> <p>24 exactly what's going on."</p> <p>25 Q. Well, what other situations would be bad</p>
<p style="text-align: right;">Page 67</p> <p>1 was having him change clothes in the garage.</p> <p>2 Q. Okay. And is that what they considered</p> <p>3 dumb?</p> <p>4 A. I don't know that dumb is the right word,</p> <p>5 but that would be something that Luke was</p> <p>6 afraid of, where now a family can't be</p> <p>7 together. And the fact that they can't be</p> <p>8 together as husband and wife would be what's</p> <p>9 dumb, not the fact that -- he's not calling her</p> <p>10 dumb.</p> <p>11 Q. He's just calling what she's doing dumb?</p> <p>12 A. We don't know what she's doing. It says</p> <p>13 she might do something.</p> <p>14 Q. But you have no idea what she -- what</p> <p>15 they thought she might do?</p> <p>16 MS. SANDERS: Object, asked and</p> <p>17 answered.</p> <p>18 BY MR. STREET:</p> <p>19 Q. Is that fair to say?</p> <p>20 A. That's fair to say.</p> <p>21 Q. Okay. I'm just asking because it's the</p> <p>22 only chance I get to ask the corporation.</p> <p>23 All right. If you'll flip over to the</p> <p>24 next page, I think. This is an e-mail, looks</p> <p>25 dated 4/14/2020?</p>	<p style="text-align: right;">Page 69</p> <p>1 thinking on the part of an employee that would</p> <p>2 require a one-on-one meeting?</p> <p>3 MS. SANDERS: Object, outside the</p> <p>4 scope.</p> <p>5 THE WITNESS: Other type of</p> <p>6 situations that would require a one-on-one</p> <p>7 meeting, is that the question?</p> <p>8 BY MR. STREET:</p> <p>9 Q. Yes.</p> <p>10 A. Okay.</p> <p>11 Q. For thinking. What thoughts were not</p> <p>12 allowed over there?</p> <p>13 A. It would be policy, procedure driven. It</p> <p>14 would be, "Hey, I want to make sure that I</p> <p>15 follow hierarchy." We're very collaborative as</p> <p>16 a team. So it wouldn't be a -- I need to make</p> <p>17 sure that I get to my leader before I act on</p> <p>18 anything, and then that leader's leader, and</p> <p>19 then that leader's leader. Like, it wouldn't</p> <p>20 be that type. It would be more collaborative.</p> <p>21 If you have something to say, you can say it.</p> <p>22 Q. Okay. And she says to DiCicco, "You are</p> <p>23 more than welcome to continue to meet with</p> <p>24 him."</p> <p>25 Was DiCicco meeting with Mr. Amos at this</p>

<p style="text-align: right;">Page 70</p> <p>1 time about something?</p> <p>2 A. Yes. So, again, my guess is that at this</p> <p>3 point, he was in transition -- Mr. Amos was in</p> <p>4 transition of reporting to Lara versus</p> <p>5 reporting to David. So David would have been</p> <p>6 his leader doing one-on-ones with him prior to</p> <p>7 that.</p> <p>8 Q. Okay. And would these one-on-ones also</p> <p>9 be about his thinking?</p> <p>10 A. One-on-ones are a normal part of doing</p> <p>11 business. They have nothing to do with your</p> <p>12 thinking. I do one-on-ones with every one of</p> <p>13 my direct reports, as does every leader at</p> <p>14 Ramsey.</p> <p>15 Q. Right. But this e-mail says this</p> <p>16 one-on-one is to get "some of that corporate</p> <p>17 think out of him."</p> <p>18 A. This is why she's requesting to have</p> <p>19 one-on-ones with him, but the one-on-one</p> <p>20 concept applies to every leader at Ramsey to</p> <p>21 meet with their team members on a weekly basis.</p> <p>22 Q. Okay. Why would she want to give</p> <p>23 Mr. Amos more attention than she already was?</p> <p>24 MS. SANDERS: Object, outside the</p> <p>25 scope.</p>	<p style="text-align: right;">Page 72</p> <p>1 resources committee to give them a heads-up so</p> <p>2 this doesn't come out of left field." Meaning</p> <p>3 if this continues to go bad, she wanted</p> <p>4 HR Committee to be aware that we were having</p> <p>5 some issues.</p> <p>6 BY MR. STREET:</p> <p>7 Q. Okay. Well, I appreciate that, but</p> <p>8 his -- her words are that she's going to</p> <p>9 "continue to help, get a gauge on how deep his</p> <p>10 attitude goes." What was problematic about</p> <p>11 Mr. Amos's attitude?</p> <p>12 A. Again, I'm reading it in full context,</p> <p>13 not out of context. In full context, "so he</p> <p>14 feels like he's contributing," tells me that he</p> <p>15 would feel like he's not contributing.</p> <p>16 Q. So "the attitude" talks about his</p> <p>17 attitude that he feels like he's not</p> <p>18 contributing?</p> <p>19 A. Correct. And my thoughts there, again,</p> <p>20 in full context, would be that he -- it wasn't</p> <p>21 a positive attitude. My guess is she's not</p> <p>22 pulling him in to talk about what a great</p> <p>23 attitude he has.</p> <p>24 Q. Right. But you said that the -- I guess</p> <p>25 I'm just confused because he feels like --</p>
<p style="text-align: right;">Page 71</p> <p>1 MR. STREET: It's not, but go ahead.</p> <p>2 THE WITNESS: So my guess, again --</p> <p>3 "so I am going to start meeting with him</p> <p>4 one-on-one. You are more than welcome to</p> <p>5 continue to meet with him. I just want to give</p> <p>6 him more attention. I could not help but feel</p> <p>7 like I failed both of you by not digging in</p> <p>8 sooner. We are going to go ahead and give Brad</p> <p>9 some other work so he feels like he's</p> <p>10 contributing. I will start talking with him</p> <p>11 through that then just to continue to help get</p> <p>12 a gauge on how deep his attitude goes. Luke</p> <p>13 and I are also going to meet with HR Committee</p> <p>14 just to give them a heads-up so all this</p> <p>15 doesn't come out of left field. I'll keep you</p> <p>16 updated and let you know if I have questions."</p> <p>17 So in reading it in full context, my</p> <p>18 guess is that Brad had said something about the</p> <p>19 fact that he's, A, not getting enough work or,</p> <p>20 B, is starting to have maybe a negative</p> <p>21 attitude toward the work that he is doing.</p> <p>22 And so Lara is saying to David, "I'd like</p> <p>23 to start meeting with him to find out what's</p> <p>24 going on, and in those meetings I will assign</p> <p>25 him more work, and I'm coming in to human</p>	<p style="text-align: right;">Page 73</p> <p>1 you're saying the attitude was that Mr. Amos</p> <p>2 felt like he wasn't contributing, and that was</p> <p>3 the bad attitude?</p> <p>4 A. Like he wasn't contributing or wasn't</p> <p>5 doing the work that he felt like he was</p> <p>6 contributing.</p> <p>7 Q. Okay. And because he didn't feel like he</p> <p>8 was contributing enough, they were going to</p> <p>9 meet with the HR Committee about that?</p> <p>10 A. Yes. So our -- our process would that be</p> <p>11 if there was a team member that a leader was</p> <p>12 having concerns with or issues with, before</p> <p>13 that leader would take action on someone, they</p> <p>14 would bring that into human resources</p> <p>15 committee.</p> <p>16 Q. Who was the -- who was on the</p> <p>17 HR Committee she's talking about here in this</p> <p>18 e-mail?</p> <p>19 A. That would be different board members and</p> <p>20 includes myself and the human resources</p> <p>21 committee.</p> <p>22 Q. And is that the same committee every</p> <p>23 time?</p> <p>24 A. It changes. I would have to go back to</p> <p>25 pull who was there in April of 2020.</p>

<p style="text-align: right;">Page 74</p> <p>1 Q. Okay. But as you sit here today, can you</p> <p>2 tell me who was on the committee best you can</p> <p>3 from your memory?</p> <p>4 A. Yeah. Best I can from my memory would be</p> <p>5 Jack Galloway, Mark Floyd, Jen Sievertsen.</p> <p>6 Q. Okay.</p> <p>7 A. Myself.</p> <p>8 Q. Okay.</p> <p>9 A. I believe that's it in 2020.</p> <p>10 Q. And the HR Committee, did they meet about</p> <p>11 Brad Amos with Lara Johnson?</p> <p>12 A. We did not. There was an e-mail that was</p> <p>13 sent. HR Committee did not meet on the week</p> <p>14 that they requested to be part of it.</p> <p>15 Q. She said she wants to get with the</p> <p>16 HR Committee to "give them a heads-up so all</p> <p>17 this." I guess I'm just confused by "all</p> <p>18 this." Does the "all this" just mean</p> <p>19 Mr. Amos's perception that he wasn't helping</p> <p>20 out as much as he should have?</p> <p>21 A. My guess is that "all this" is</p> <p>22 reference -- in reference to his attitude, not</p> <p>23 to the fact that he wasn't contributing.</p> <p>24 Q. Okay. And that's what I'm trying to get</p> <p>25 at. What about his attitude was the issue?</p>	<p style="text-align: right;">Page 76</p> <p>1 2020, at 3:22 p.m. --</p> <p>2 Q. Yes.</p> <p>3 A. -- from Lara Johnson to HR Committee,</p> <p>4 where she is asking "I am needing to come and</p> <p>5 talk with HR Committee about the future of Brad</p> <p>6 Amos. We talked about him back in March, and I</p> <p>7 have been meeting with him weekly."</p> <p>8 Q. Okay. Well, let's -- let's stop right</p> <p>9 there a second.</p> <p>10 Now, did Ms. Johnson actually come in and</p> <p>11 meet with the HR Committee about Mr. Amos?</p> <p>12 A. I don't remember that.</p> <p>13 Q. So is it fair to say that Mr. Amos was</p> <p>14 terminated without an HR Committee meeting</p> <p>15 taking place?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. So it didn't matter what the</p> <p>18 HR Committee thought, he was fired anyway; fair</p> <p>19 to say?</p> <p>20 A. Luke LeFevre sent an e-mail to</p> <p>21 HR Committee asking for moneys to present to</p> <p>22 Brad Amos, and then in that meeting, he was</p> <p>23 terminated.</p> <p>24 Q. Okay. But I mean when -- he was asking</p> <p>25 for money for a separation agreement, wasn't</p>
<p style="text-align: right;">Page 75</p> <p>1 A. I have the e-mail to go by that you have</p> <p>2 to go by. So we would have to ask Lara Johnson</p> <p>3 exactly what it meant.</p> <p>4 Q. Right. But as far as the corporation is</p> <p>5 here today to ask questions --</p> <p>6 A. Uh-huh.</p> <p>7 Q. -- you can't tell me one thing that</p> <p>8 Mr. Amos had a bad attitude about?</p> <p>9 A. I can tell you from the e-mails that</p> <p>10 they've written what eventually came out, but</p> <p>11 on this date given the paper that I have in</p> <p>12 front of me, I cannot.</p> <p>13 Q. Okay.</p> <p>14 A. I can tell what you it led to with the</p> <p>15 information I now have --</p> <p>16 Q. Okay.</p> <p>17 A. -- and the e-mail that Luke LeFevre sent.</p> <p>18 Q. Okay. Why don't you do that.</p> <p>19 A. Okay. Can we pull the e-mail that Luke</p> <p>20 LeFevre sent to HR Committee?</p> <p>21 Q. If it's in this group we can; if not,</p> <p>22 we'll find it.</p> <p>23 A. It's not included in this group. The one</p> <p>24 that is included in this group is an e-mail</p> <p>25 from Lara Johnson dated Monday, July 27th,</p>	<p style="text-align: right;">Page 77</p> <p>1 he?</p> <p>2 A. That's correct.</p> <p>3 Q. Okay. So he already had been determined</p> <p>4 he was going to be fired?</p> <p>5 A. The way the e-mail was written by Luke</p> <p>6 LeFevre, he was going to be given an option to</p> <p>7 go on a performance improvement plan or take a</p> <p>8 separation amount.</p> <p>9 Q. Right.</p> <p>10 A. He was asking approval ahead of time for</p> <p>11 that amount.</p> <p>12 Q. And was that what was done?</p> <p>13 A. Correct.</p> <p>14 Q. Let me go back to this e-mail you were</p> <p>15 just reading from on July 27, 2020, 3:23.</p> <p>16 You're saying the HR Committee never met but</p> <p>17 that Luke LeFevre sent an e-mail one time about</p> <p>18 it?</p> <p>19 A. Yeah.</p> <p>20 Q. Okay. But in this e-mail, she says, "We</p> <p>21 talked about him back in March, and I've been</p> <p>22 meeting with him weekly."</p> <p>23 Is this, the e-mails we just read from,</p> <p>24 where she said she was going to start having</p> <p>25 the one-to-ones?</p>

<p style="text-align: right;">Page 78</p> <p>1 A. Yes.</p> <p>2 Q. Was there any other talk from Ms. Johnson</p> <p>3 to the committee other than those e-mails?</p> <p>4 A. I don't know the answer to that question.</p> <p>5 Q. Okay. She says, "Not much has changed."</p> <p>6 What was -- you know, because I want to look</p> <p>7 back -- I'm sorry. If we go back to this</p> <p>8 e-mail from before, maybe I just don't see it,</p> <p>9 but I thought Lara Johnson had just sent that</p> <p>10 e-mail before about Brad Amos to David DiCicco</p> <p>11 only. I think you might have it right there.</p> <p>12 It's dated 4/14.</p> <p>13 A. Yeah, 4/14/2020, 1:16 p.m.</p> <p>14 Q. She did communicate with the -- so</p> <p>15 there's an e-mail to</p> <p>16 HRCommittee@daveramsey.com, right?</p> <p>17 A. Yes, from -- from Luke LeFevre, not from</p> <p>18 Lara Johnson, if I'm not mistaken.</p> <p>19 Q. Well, this one I'm looking at is from</p> <p>20 Lara Johnson to HR Committee. We were just</p> <p>21 reading from it.</p> <p>22 A. Yes, Monday July 27th, 2020.</p> <p>23 Q. So she could have sent an e-mail, maybe</p> <p>24 she did send one, to the HR Committee about</p> <p>25 Brad Amos prior to this one. Is that what</p>	<p style="text-align: right;">Page 80</p> <p>1 A. That's correct.</p> <p>2 Q. And it also says that Mr. Amos apparently</p> <p>3 told her, "There are things I wish I knew</p> <p>4 before I took this job."</p> <p>5 Do you see that?</p> <p>6 A. I see that.</p> <p>7 Q. What were those things he said he wished</p> <p>8 he knew before he took the job?</p> <p>9 A. She doesn't spell it out, so I don't</p> <p>10 recall them.</p> <p>11 Q. Did you ever know them?</p> <p>12 A. I -- I do know them now given what Brad</p> <p>13 said.</p> <p>14 Q. Okay. What were they?</p> <p>15 A. That he would not be working on the</p> <p>16 documentary, that he would not be quickly</p> <p>17 promoted, that this was not a come in, make a</p> <p>18 big splash, and get promoted quickly.</p> <p>19 Q. That's what he thought was going to</p> <p>20 happen?</p> <p>21 A. That's what he said.</p> <p>22 Q. Okay. And those are the things that he</p> <p>23 said he wish he knew before he took the job?</p> <p>24 A. That is my guess of what he's referencing</p> <p>25 given that line by Lara.</p>
<p style="text-align: right;">Page 79</p> <p>1 happened?</p> <p>2 A. That could be.</p> <p>3 Q. Okay. And if you look through there, are</p> <p>4 they in those e-mails there? Maybe I'm just</p> <p>5 not seeing it. And I'd be talking about an</p> <p>6 e-mail that would be dated prior to July 27th,</p> <p>7 2020.</p> <p>8 MS. SANDERS: For the record, what's</p> <p>9 this exhibit number?</p> <p>10 MS. IRWIN: It's 4.</p> <p>11 MS. SANDERS: Okay.</p> <p>12 MS. IRWIN: It's collective.</p> <p>13 THE WITNESS: There was an additional</p> <p>14 e-mail that's not listed here where Lara is</p> <p>15 asking to be on HR Committee back in March.</p> <p>16 MR. STREET: Okay. Can we get that</p> <p>17 one?</p> <p>18 MS. IRWIN: I'm looking.</p> <p>19 BY MR. STREET:</p> <p>20 Q. And when she says, "Not much has</p> <p>21 changed," she's referencing that e-mail you</p> <p>22 just told me about?</p> <p>23 A. Correct.</p> <p>24 Q. The one that's not in this group, not</p> <p>25 part of Exhibit 4?</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. Okay. I don't want you to guess. If you</p> <p>2 don't know, say, "I don't know." That's fine.</p> <p>3 Fair to say?</p> <p>4 A. That's fair to say.</p> <p>5 Q. So it sounds like we just don't know</p> <p>6 what she -- as you sit here today, you can't</p> <p>7 tell me what he told her to make her say that</p> <p>8 in this e-mail?</p> <p>9 A. Correct.</p> <p>10 Given that e-mail, I would not have known</p> <p>11 at that time what it was.</p> <p>12 Q. Okay. And it says, "I want to see if it</p> <p>13 is time to do an emotional firing."</p> <p>14 What is an emotional firing?</p> <p>15 A. This would be where we give someone the</p> <p>16 option to either go on a performance</p> <p>17 improvement plan or given an amount of money to</p> <p>18 opt out.</p> <p>19 Q. Okay. Why would you call that an</p> <p>20 emotional firing?</p> <p>21 A. It's -- it's really an emotional time for</p> <p>22 that person. So imagine if you were sitting</p> <p>23 there being told, "Hey, your performance is</p> <p>24 such that you can either go on this performance</p> <p>25 improvement plan or you can take this money and</p>

<p style="text-align: right;">Page 82</p> <p>1 leave." The term "emotional firing" is the</p> <p>2 term that is used at Ramsey for that</p> <p>3 conversation because it almost feels like a</p> <p>4 firing. It's not, but it feels that way.</p> <p>5 Q. Okay. And then she says, "I don't</p> <p>6 believe this is going to get better, and I</p> <p>7 don't believe he will take the money. Instead,</p> <p>8 he will want to make it work."</p> <p>9 Do you see that?</p> <p>10 A. Yeah, I see that.</p> <p>11 Q. All right. And is that indeed what</p> <p>12 Mr. Amos wanted to do?</p> <p>13 A. No.</p> <p>14 Q. Okay.</p> <p>15 A. It never got to that point of being</p> <p>16 presented with the two options.</p> <p>17 Q. Okay. All right. If you look at the --</p> <p>18 above that, Jack Galloway, the executive vice</p> <p>19 president?</p> <p>20 A. Yes.</p> <p>21 Q. This e-mail, it looks like it was sent on</p> <p>22 Tuesday, July 28th, at 8:11 p.m.</p> <p>23 MS. SANDERS: Let me find that</p> <p>24 e-mail. I don't have that e-mail in front of</p> <p>25 me.</p>	<p style="text-align: right;">Page 84</p> <p>1 side of that, if I were to guess.</p> <p>2 MS. SANDERS: Yeah, I'm still not</p> <p>3 seeing it.</p> <p>4 MS. IRWIN: It is 359.</p> <p>5 MS. SANDERS: Okay.</p> <p>6 MS. IRWIN: It's Page 245 of the PDF,</p> <p>7 if that's helpful.</p> <p>8 MS. SANDERS: Yes. I'm almost there.</p> <p>9 Okay. I'm referring to LAMPO_0359.</p> <p>10 MS. IRWIN: That's the one.</p> <p>11 MS. SANDERS: Okay.</p> <p>12 BY MR. STREET:</p> <p>13 Q. All right. And do you see the e-mail I'm</p> <p>14 talking from Jack Galloway dated July 28, 2020,</p> <p>15 at 8:21 p.m.?</p> <p>16 A. I do.</p> <p>17 Q. All right. And he says in this e-mail,</p> <p>18 "HRC doesn't meet this week. We are having</p> <p>19 exec comm stratop"?</p> <p>20 Did I say that right?</p> <p>21 A. Stratop.</p> <p>22 Q. Stratop.</p> <p>23 What is exec comm stratop?</p> <p>24 A. Executive committee is what exec comm is</p> <p>25 referencing. Stratop is strategic operations.</p>
<p style="text-align: right;">Page 83</p> <p>1 MR. STREET: It's the same page as we</p> <p>2 were just reading form. It's this e-mail right</p> <p>3 above it.</p> <p>4 THE WITNESS: There's two e-mails</p> <p>5 from Lara. So one is Luke replied, and then</p> <p>6 the second one -- there's two identical ones.</p> <p>7 MS. SANDERS: Yeah, that's not the</p> <p>8 one I had in front of me.</p> <p>9 MR. STREET: Okay.</p> <p>10 MS. SANDERS: There's not -- there's</p> <p>11 not a number -- a Bates number on that one?</p> <p>12 MS. IRWIN: No. I can get it for you</p> <p>13 in a second, though, I think.</p> <p>14 MS. SANDERS: What's the -- what's</p> <p>15 the date again?</p> <p>16 MR. STREET: July 28th, 2020,</p> <p>17 8:21 p.m.</p> <p>18 Did you find it?</p> <p>19 MS. SANDERS: No. Do you have any</p> <p>20 idea where -- where it is in the production? I</p> <p>21 can just find -- I mean, there's like 600 --</p> <p>22 500 documents I'm scrolling through.</p> <p>23 MS. IRWIN: Yeah. Well, I mean, you</p> <p>24 get to like 350, you get past all the other</p> <p>25 calendar invites, it's probably on the other</p>	<p style="text-align: right;">Page 85</p> <p>1 And so they were basically going to meet to</p> <p>2 have a planning section for the coming year.</p> <p>3 Q. Okay. And he says, "If you like, I can</p> <p>4 add you to next week's agenda to come in and</p> <p>5 discuss it."</p> <p>6 Do you know if this matter was added to</p> <p>7 the agenda for the HR Committee?</p> <p>8 A. It was not.</p> <p>9 Q. Okay. Why was it not?</p> <p>10 A. Luke LeFevre sent an e-mail kind of</p> <p>11 summarizing and reiterating what Lara had said</p> <p>12 about asking for the money and outlining that</p> <p>13 he was ready to have that conversation that we</p> <p>14 called an emotional firing earlier --</p> <p>15 Q. Right.</p> <p>16 A. -- and asked for permission to have that</p> <p>17 conversation on that Monday.</p> <p>18 Q. Okay. It sounds like -- he says, "But it</p> <p>19 sounds to me like you feel like he needs to</p> <p>20 leave."</p> <p>21 I keep going back to this, but I'm just</p> <p>22 not clear. What was it about Mr. Amos that</p> <p>23 Mr. Amos was doing or his attitude that made it</p> <p>24 sound like he needed to leave?</p> <p>25 A. I think it's probably a combination of</p>

<p style="text-align: right;">Page 86</p> <p>1 things, but I am inferring by what Lara Johnson</p> <p>2 said: So "It sounds to me like you feel he</p> <p>3 needs to leave." She's asking for the money,</p> <p>4 and she's saying, "I don't believe that things</p> <p>5 are going to get better, and I don't believe he</p> <p>6 will take the money."</p> <p>7 Q. Right. And I guess I keep coming back</p> <p>8 to, what are the things that are not going to</p> <p>9 get better? What are the things that indicated</p> <p>10 he needed to leave?</p> <p>11 A. Yeah.</p> <p>12 Q. What are those things?</p> <p>13 A. So knowing what I know today, it would be</p> <p>14 the combination of his lack of being able to do</p> <p>15 the work we hired him to do, the lack of his</p> <p>16 ability to collaborate with others.</p> <p>17 Q. Okay. Hold on a second.</p> <p>18 Lack of ability to do the work?</p> <p>19 A. Yeah. So it's all the things that Luke</p> <p>20 LeFevre outlined in that e-mail that we had --</p> <p>21 Q. The lack of -- I'm sorry. What was the</p> <p>22 second thing you said? You said it's the lack</p> <p>23 of ability to do the work?</p> <p>24 A. Or collaborate with others.</p> <p>25 Q. Lack of -- lack of collaboration.</p>	<p style="text-align: right;">Page 88</p> <p>1 A. This is where Mr. DiCicco breaks down.</p> <p>2 Q. Mr. DiCicco.</p> <p>3 A. You hear some of the frustrations and</p> <p>4 issues he's having with Mr. Amos.</p> <p>5 Q. Okay. And is this the e-mail that you</p> <p>6 were just saying that the -- when I asked</p> <p>7 you how he didn't -- how he wasn't able to</p> <p>8 do -- to do the job you hired him to do, you</p> <p>9 said there was an e-mail that set -- set that</p> <p>10 out. Is this the e-mail you're talking about?</p> <p>11 A. Yeah, this is the e-mail that I</p> <p>12 reference. There's also a secondary e-mail by</p> <p>13 Luke LeFevre to HR Committee outlining all</p> <p>14 the issues that they've had with Brad Amos and</p> <p>15 why he's recommending the moneys and emotional</p> <p>16 firing conversation that we talked about</p> <p>17 earlier.</p> <p>18 Q. Okay. All right. And then on the second</p> <p>19 page of this exhibit in this same e-mail dated</p> <p>20 April 7th, 2020, at 12:17, it says, "You agreed</p> <p>21 to be here as part of a team -- be here --</p> <p>22 Excuse me. Let me read -- Strike that.</p> <p>23 "You agreed to be here to be part of a</p> <p>24 team, not edit a documentary."</p> <p>25 What did he mean when he said that?</p>
<p style="text-align: right;">Page 87</p> <p>1 Anything else?</p> <p>2 A. Again, there's more listed in that</p> <p>3 e-mail --</p> <p>4 Q. Okay.</p> <p>5 A. -- that's not included in this group</p> <p>6 of -- this exhibit that was handed to me.</p> <p>7 Q. What indicated that Mr. Amos had a lack</p> <p>8 of ability to do the work he was hired to do?</p> <p>9 A. It was his missed deadlines that was</p> <p>10 outlined in the David DiCicco e-mail where he</p> <p>11 says, "I would like to have the following</p> <p>12 conversation with Brad Amos."</p> <p>13 It was his lack of being transparent to</p> <p>14 Mr. DiCicco about the fact that those deadlines</p> <p>15 were not being met.</p> <p>16 Q. Okay. Anything else besides the</p> <p>17 deadlines?</p> <p>18 A. The communication and the deadline miss,</p> <p>19 yes.</p> <p>20 Q. I think -- didn't we look at one of these</p> <p>21 e-mails today from where -- or maybe it was the</p> <p>22 one he was going to send Brad. Do you see that</p> <p>23 was on the first page, Exhibit No. 4? Is this</p> <p>24 the e-mail you were talking about where</p> <p>25 Mr. LeFevre [sic] breaks down --</p>	<p style="text-align: right;">Page 89</p> <p>1 A. That he took the job to be part of a</p> <p>2 team, not to be a solo person editing a</p> <p>3 documentary. He wasn't a contract team member</p> <p>4 hired to edit a documentary and only that.</p> <p>5 Q. Okay. Was Mr. Amos actually doing that,</p> <p>6 acting like he was the lone wolf, so to stay?</p> <p>7 A. We would have to read the whole thing in</p> <p>8 context, but yes.</p> <p>9 Q. Go ahead and read it and answer me, then.</p> <p>10 A. Sure. So if we start at the top where it</p> <p>11 says: "This is what I want to communicate,"</p> <p>12 right, "I have to have an honest conversation</p> <p>13 with you. Been wrestling with a few things.</p> <p>14 Want to talk through those, so just listen."</p> <p>15 This is his suggesting this to Luke LeFevre as</p> <p>16 the conversation he's go to have with Brad</p> <p>17 Amos.</p> <p>18 "I hope you understand my frustration</p> <p>19 back on March 6 when we talked about missing</p> <p>20 the 'Cards and Quotes' assembly edit screener</p> <p>21 deadline. I want to reiterate why.</p> <p>22 On January 14th, we sat down, I told you</p> <p>23 I can easily slip in to micromanaging a project</p> <p>24 like this, but I didn't have the bandwidth, and</p> <p>25 I also wanted to give you the space to create</p>

<p style="text-align: right;">Page 90</p> <p>1 and do your thing. We had a rough paper edit 2 and a narrow" -- "and a narrative structure we 3 had all worked through. This was the starting 4 point to build a story out of. You had eight 5 weeks to work through the assembly edit." 6 That would be the assembly edit that he 7 missed. 8 "I traveled a few weeks during that time, 9 but when I would do check-ins asking how the 10 work was coming, help answer any questions we 11 needed to talk through, you kept saying things 12 were fine. I believed you. But then on 13 March 5th, the day before we're supposed to 14 screen a rough assembly of the film, I find out 15 we aren't anywhere close to having an assembly 16 edit done. 17 So this is what that does to me. I was 18 really frustrated because we didn't hit the 19 agreed deadline; ZERO communication that it was 20 behind; it wasn't until asked last minute that 21 you mentioned that you didn't have it where we 22 wanted it to me. BIG MISS," in bold letters. 23 Q. I'm not asking you to read everything, 24 but what I am asking you to do is tell me is -- 25 did Mr. Amos, you said in this -- the second</p>	<p style="text-align: right;">Page 92</p> <p>1 Brad was taken off this project during that 2 conversation with Mr. DiCicco. "Dennis is 3 running point as we wrestle the story over the 4 next few weeks." So he was taken off running 5 point on this story. 6 Q. Mr. Amos was? 7 A. Correct. 8 Q. Excuse me. 9 Now, Dennis, did he work from home during 10 the pandemic, or did he actually come in the 11 office? 12 A. I don't know that. 13 Q. Who is Dennis? 14 A. Dennis would have been another video 15 editor -- another senior video editor. 16 Q. What was his last name? 17 A. I don't recall that. I can get it for 18 you, but I don't recall that. 19 Q. Okay. Thank you. 20 All right. I think the next page that 21 you may look at here in your stack is an e-mail 22 dated 4/13/2020 from Lara Johnson to Luke 23 LeFevre and David DiCicco. 24 There you go. 25 A. Okay.</p>
<p style="text-align: right;">Page 91</p> <p>1 part of this e-mail, that he agreed to be here, 2 a part of a team, not edit a documentary. Was 3 Mr. Amos working on it as just it was his 4 project and his alone? 5 A. Yes. 6 Q. Okay. 7 A. He was acting like it was his project and 8 his alone, but, also, he was saying -- so if I 9 can come back to this? 10 Q. Sure. 11 A. I just want to continue. 12 So "Even after we had the first 13 conversation about missing the deadline, you 14 confidently told me the first half of the film 15 would be cut by the following Friday. 16 Thursday, when I checked in, you needed an 17 extra day. I had to follow up with you on the 18 progress. Trust was broken during this." 19 So where -- where this is going is that 20 not only did he miss the deadline on the 21 project that he was assigned, he basically 22 said, "Hey, I'm not doing anything else except 23 editing the documentary." 24 Q. Okay. 25 A. The last line of that sentence is where</p>	<p style="text-align: right;">Page 93</p> <p>1 Q. This -- the first e-mail on top of the 2 page, the one dated 4/13/2020, 1:22:29 p.m., it 3 says, "Yes, I saw that this morning and made a 4 note," Lara Johnson. And the first e-mail 5 looks like it was -- it might have been cut 6 off. Do you see the one I'm talking about? 7 A. Yeah. At the bottom? 8 Q. Yeah. 9 A. The one from Luke LeFevre to David 10 DiCicco and Lara Johnson dated Monday, 11 April 13th, at 8:21 a.m.? 12 Q. Okay. What are these little smiley, 13 happy faces things here? What is -- what are 14 those? 15 A. They're in reference. We do a weekly 16 report, every team member does one, that 17 basically informs their leader how their -- 18 their week was, anything special going on in 19 their lives. This is one portion of the report 20 that has the smiley faces. 21 And so it looks like this is off of Brad 22 Amos's weekly report for that week or the week 23 that just ended. So this would have been the 24 week prior to April 13th. Looks like Brad 25 listed his morale as low or mediocre. As with</p>

<p style="text-align: right;">Page 94</p> <p>1 everyone, lots of them started doing the</p> <p>2 mandatory quarantine, stress, he listed, as</p> <p>3 well as not doing well. It says, "No work,</p> <p>4 little feedback, bit of a limbo, makes things a</p> <p>5 bit stressful, as I'm sure it does with</p> <p>6 everyone." Workload he listed the same way.</p> <p>7 Q. What's a QNAP, Q-N-A-P?</p> <p>8 A. Don't have a clue.</p> <p>9 And then you can see that the next</p> <p>10 section of that report is what's on the bottom</p> <p>11 where it lists weekly high, weekly low, or</p> <p>12 anything else. And he didn't -- it doesn't</p> <p>13 appear he put anything in those boxes.</p> <p>14 Q. But this is something they did every</p> <p>15 week, correct?</p> <p>16 A. That's correct.</p> <p>17 Q. So they didn't just do it on April 13th,</p> <p>18 2020. But on the next page, September 30th,</p> <p>19 2019, there was a bunch between those two as</p> <p>20 well?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. These are the ones we have.</p> <p>23 All right. Now, these -- what would you</p> <p>24 call these actual reports that these employees</p> <p>25 would do?</p>	<p style="text-align: right;">Page 96</p> <p>1 but if you're going through a divorce, and I</p> <p>2 know that, it helps me be more cognizant as to</p> <p>3 how to lead you.</p> <p>4 Q. And would marital problems be the kind of</p> <p>5 thing you talk about in these weekly reports?</p> <p>6 A. It's up to the team member on what they</p> <p>7 write down. So -- and there's no guide that</p> <p>8 says, "You must tell us this." It's up to each</p> <p>9 individual what they're comfortable</p> <p>10 communicating up to their leaders.</p> <p>11 Q. What guidance is provided to these</p> <p>12 employees as to what to include in these</p> <p>13 reports?</p> <p>14 A. It's really what you see. There's</p> <p>15 nothing more. So it's, Hey, we want to hear</p> <p>16 from you on how you're doing, how your morale</p> <p>17 is doing. We want to hear from you on your</p> <p>18 stress and the amount of stress you're feeling.</p> <p>19 We want to know your workload and whether we</p> <p>20 need to address that. And then there's a high,</p> <p>21 what was your high for the week, what was</p> <p>22 the -- something that happened that was</p> <p>23 extraordinary, what was the low, and then is</p> <p>24 there anything else that we should know.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 95</p> <p>1 A. We call them weekly reports.</p> <p>2 Q. Weekly reports?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And would it be about work, or would it</p> <p>5 be about the person's personal life?</p> <p>6 A. It's work, but it's everything. So</p> <p>7 morale could be -- somebody could be listing</p> <p>8 I've got family drama going on or lost a pet at</p> <p>9 home or something like that. Stress is usually</p> <p>10 work related but not always. Workload is</p> <p>11 obviously workload related to work. And then</p> <p>12 the weekly high, weekly low are anything else.</p> <p>13 It's open to whatever someone wants to</p> <p>14 communicate.</p> <p>15 Q. Okay. Well, were employees encouraged to</p> <p>16 share personal things about them outside of the</p> <p>17 work in these reports?</p> <p>18 A. They're encouraged to tell us what's</p> <p>19 going on with their lives so that we could be</p> <p>20 aware of that.</p> <p>21 Q. Okay. So the -- Ramsey wants to be aware</p> <p>22 of what's going on in work but also in their</p> <p>23 personal lives as well?</p> <p>24 A. Only as it affects their work. So if I</p> <p>25 know that you're -- I'm going to exaggerate,</p>	<p style="text-align: right;">Page 97</p> <p>1 A. That's the guidance that is provided to</p> <p>2 our team.</p> <p>3 Q. All right. Is it a form that they fill</p> <p>4 out? Is it a website?</p> <p>5 A. It's electronic.</p> <p>6 Q. Electronic form?</p> <p>7 A. No. It's an app, so it's not a form.</p> <p>8 Q. What's the app called?</p> <p>9 A. It's our own. It's part of</p> <p>10 EntreLeadership, so we created it.</p> <p>11 Q. All right. So it looks like that</p> <p>12 Mr. LeFevre forwarded this report from Mr. Amos</p> <p>13 to David DiCicco and Lara Johnson?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Is that yes?</p> <p>16 A. That's correct.</p> <p>17 Q. Is there something unusual or spectacular</p> <p>18 about this report that would require him to</p> <p>19 forward it to his supervisors?</p> <p>20 A. The -- what would be unusual, as a leader</p> <p>21 if I'm reading this, I would say there -- the</p> <p>22 fact that there's "no work, little feedback, a</p> <p>23 bit of limbo makes things a bit stressful. I'm</p> <p>24 sure it does with everyone," so this would</p> <p>25 be -- the way that this application works is</p>

<p style="text-align: right;">Page 98</p> <p>1 whoever the team member is, their leader can 2 see that team leader, and that leader's leader 3 can also see that, hence, why Luke LeFevre was 4 able to see this report. And then he would say 5 why is he not getting feedback? Why he is in 6 limbo? So he would send it to Laura and Dave 7 DiCicco, which is what he did on that 4/13/2020 8 at 1:22, right? He -- so he -- he sends it and 9 then Lara replies saying, "Hey, I saw it and 10 made a note to talk to you about it," is my 11 guess, because on the subject line it says, 12 "Let's talk about it at 9:30 as well." 13 Q. Okay. All right. Let's look at the -- 14 keep on flipping back through those e-mails. 15 There's one dated 7/10/2020. That might have 16 been it you just flipped over. 17 A. That's dated 9/30/2019. 18 Q. Oh, okay. Keep going. 19 The next one should be -- 20 A. Let's see. April 8th. 21 Q. I think you may be missing that one. The 22 one that's April 3rd, 2019, 3:07, which you 23 said you had, it said "Missing the fam"? 24 A. Yeah. 25 Q. And then the next page is the one I was</p>	<p style="text-align: right;">Page 100</p> <p>1 make copies of all four? 2 MS. SANDERS: Okay. 3 THE VIDEOGRAPHER: We are going off 4 the record. The time is 12:30 p.m. 5 (Lunch break.) 6 THE VIDEOGRAPHER: We are back on the 7 record. The time on the video monitor is 8 1:43 p.m. 9 BY MR. STREET: 10 Q. All right. Mr. Lopez, before we left -- 11 broke for lunch, we were talking about these 12 e-mails which are sitting in front of you. 13 I think if you go back to I believe it's 14 the seventh page in your packet, it's an 15 e-mail -- we're talking about it was the top of 16 the page is from Luke LeFevre 7/29/2020? 17 A. Yes, sir. 18 Q. All right. Do you see the one I'm 19 talking about? 20 A. Yes. 21 Q. Okay. Now, I want to go back to if you 22 look at the bottom of the page, it looks like 23 the first -- one of the e-mails in the string 24 was sent at July 29, 2020, at 7:25 a.m., and 25 it's sent from Luke LeFevre to Jack Galloway,</p>
<p style="text-align: right;">Page 99</p> <p>1 talking about, which you may not have. We'll 2 come back to that one. 3 A. Okay. 4 Q. The next one you have, is it dated 5 7/29/20, 2:58:09 p.m.? 6 A. 7/29/2020, 2:58:09? 7 Q. Yes. 8 All right. So it looks like in this 9 e-mail string, there is some e-mails from Luke 10 LeFevre on 7/29/2020 at 7:25 a.m. to 11 Jack Galloway, Lara Johnson, and the 12 HR Committee, and it says, "Let's get together 13 today or tomorrow and talk through this." 14 Do you see this? 15 A. Yes. 16 Q. What -- 17 MS. SANDERS: I don't see that. 18 Maybe it be easier if I just make a copy of 19 what he's looking at. 20 MR. STREET: That's fine. 21 MS. SANDERS: Why don't we do that. 22 Why don't we take a break and make a copy of 23 that, so that -- I'm sorry -- so that I can 24 follow along. 25 MR. STREET: That's okay. Can you</p>	<p style="text-align: right;">Page 101</p> <p>1 Lara Johnson, and Committee - HR. Now, if -- 2 if these e-mails are sent to Committee - HR, do 3 you receive those as well? 4 A. Yes, I do. 5 Q. Okay. Well, when he says -- I think it 6 should say, "Lara, let's get together today" -- 7 "today or tomorrow and talk this through." 8 What was he talking about? What did he want to 9 talk through? It's on the bottom of this page. 10 A. Yeah, I was trying to see if there was 11 another e-mail that was further down this 12 thread, but I don't see it. I am not sure what 13 he's referring to there. 14 Q. Okay. And it looks like you respond. 15 You say, "has been under here one year" -- 16 "under one year and makes 90K. We would 17 normally offer 5K." 18 A. Correct. 19 Q. So at some point, did Mr. LeFevre ask you 20 about preparing a severance agreement? 21 A. This is why I felt there was something 22 missing. So I think there's the -- he's 23 probably saying there's an emotional 24 conversation happening, and I would like to 25 offer X amount.</p>

<p style="text-align: right;">Page 102</p> <p>1 Do you mind if I look back through some</p> <p>2 of the e-mails?</p> <p>3 Q. No, go ahead.</p> <p>4 A. So I believe these do connect.</p> <p>5 Q. Okay.</p> <p>6 A. I believe it starts with the following</p> <p>7 page from the one you were on.</p> <p>8 Q. The one --</p> <p>9 A. An e-mail from Lara Johnson sent Monday</p> <p>10 July 27th at 3:23 p.m.</p> <p>11 Q. Okay.</p> <p>12 A. And this is where Lara's asking or</p> <p>13 stating needing to come speak with the</p> <p>14 HR Committee about the future of Brad Amos; we</p> <p>15 talked to him back in March; there's some</p> <p>16 things I wish I knew before I took the job, and</p> <p>17 in that, she's basically saying 20K or so</p> <p>18 amount to leave that she'd like to offer. Jack</p> <p>19 weighs in, then I believe Luke weighs in. The</p> <p>20 subject line on all of these e-mails is</p> <p>21 identical --</p> <p>22 Q. Okay.</p> <p>23 A. -- which is what makes me think it's one</p> <p>24 thread.</p> <p>25 Q. All right. Well, you're here to testify</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. I get it.</p> <p>2 A. Hence, I replied with that.</p> <p>3 Q. Right. But I'm asking you did anyone in</p> <p>4 particular ask you, hey, how much can we give</p> <p>5 this guy to get rid of him?</p> <p>6 A. No.</p> <p>7 Q. Okay. And what did you base that on, one</p> <p>8 year makes 90K, we normally offer 5K? Is that</p> <p>9 something they do a lot at Ramsey?</p> <p>10 A. We have a guideline that we would</p> <p>11 utilize --</p> <p>12 Q. Okay.</p> <p>13 A. -- when we offer severance. Basically,</p> <p>14 we look at how long they've been with the</p> <p>15 company and how much they're earning to</p> <p>16 determine the severance amount.</p> <p>17 Q. The severance amount they'll be offered?</p> <p>18 A. Correct.</p> <p>19 Q. All right. Well, looking back at the</p> <p>20 e-mail you said before, the one from</p> <p>21 Jack Galloway dated July 28th, 2020, at</p> <p>22 8:21 p.m. --</p> <p>23 A. Yes, sir --</p> <p>24 Q. -- do you see that one?</p> <p>25 A. -- I do.</p>
<p style="text-align: right;">Page 103</p> <p>1 to this today, so this is how we'll find out.</p> <p>2 A. Correct.</p> <p>3 Q. So I just need you tell me what you know.</p> <p>4 A. Right.</p> <p>5 Q. And what you know is what Ram- -- or what</p> <p>6 Lampo knows?</p> <p>7 A. Correct.</p> <p>8 Q. If you tell me you don't know, you're</p> <p>9 telling me Lampo doesn't know.</p> <p>10 A. Correct.</p> <p>11 Q. Okay.</p> <p>12 A. In the reviewing these documents, they</p> <p>13 appear to be one thread.</p> <p>14 Q. Okay.</p> <p>15 A. So I would treat them as one thread,</p> <p>16 hence, my reply is Brad has been here under one</p> <p>17 year, makes 90K, we would normally offer 5K.</p> <p>18 Q. Okay. Did someone ask you about how much</p> <p>19 that you needed to offer Brad to get him out of</p> <p>20 there?</p> <p>21 A. No, they did not, but it is in the</p> <p>22 e-mail.</p> <p>23 Q. You just volunteered in the amount?</p> <p>24 A. It's in the e-mail that starts on that</p> <p>25 Monday, July 27th. This is one thread.</p>	<p style="text-align: right;">Page 105</p> <p>1 Q. It sounds like in the second paragraph,</p> <p>2 it says, "It sounds to me like you feel like he</p> <p>3 needs to leave."</p> <p>4 And he's telling that to Lara Johnson,</p> <p>5 correct?</p> <p>6 A. That is correct.</p> <p>7 Q. Lara -- I'm sorry.</p> <p>8 Lara Johnson was not Mr. Amos's direct</p> <p>9 supervisor?</p> <p>10 A. She would have been at that point.</p> <p>11 Q. She was his direct supervisor?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. I apologize. I thought it was</p> <p>14 Mr. LeFevre was her -- was his direct</p> <p>15 supervisor?</p> <p>16 A. I'm sorry. Can you repeat your question?</p> <p>17 Q. Sure.</p> <p>18 Mr. Amos's direct supervisor was</p> <p>19 Mr. LeFevre or --</p> <p>20 A. No. It was never -- Luke LeFevre was</p> <p>21 never Brad Amos's direct supervisor.</p> <p>22 Q. Okay. Lara Johnson was?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. Was there any other direct</p> <p>25 supervisor he had when he was there?</p>

<p style="text-align: right;">Page 106</p> <p>1 A. David DiCicco when he was hired.</p> <p>2 Q. Okay. I'm getting LeFevre and DiCicco</p> <p>3 confused.</p> <p>4 DiCicco, is he still with the company?</p> <p>5 A. Yes.</p> <p>6 Q. Is LeFevre still with the company?</p> <p>7 A. No.</p> <p>8 Q. Where is he now?</p> <p>9 A. He's retired. He's in Nashville. I</p> <p>10 don't know what he's doing.</p> <p>11 Q. Okay. Why did he leave?</p> <p>12 MS. SANDERS: Outside the scope</p> <p>13 objection.</p> <p>14 BY MR. STREET:</p> <p>15 Q. You can answer.</p> <p>16 A. He left to go do his own thing; be an</p> <p>17 author, speaker, write a book.</p> <p>18 Q. Is he what you would call a Ramsey</p> <p>19 personality, Luke LeFevre?</p> <p>20 A. No.</p> <p>21 Q. Well, going back to what Mr. Galloway</p> <p>22 says here, this says, from the sounds of it, "I</p> <p>23 would suggest a one-time final write-up instead</p> <p>24 of a 90-day plan."</p> <p>25 What -- did they -- what would be in this</p>	<p style="text-align: right;">Page 108</p> <p>1 back up.</p> <p>2 In the e-mail from David DiCicco, he is</p> <p>3 stating that he was not doing those things.</p> <p>4 Q. Right. But what I'm asking is you said</p> <p>5 that his no communication was with his fellow</p> <p>6 video editors, unless -- or did I misunderstand</p> <p>7 you?</p> <p>8 A. Yes, the communication that he was not</p> <p>9 having was with David DiCicco, his immediate</p> <p>10 leader.</p> <p>11 Q. So it wasn't with his fellow video</p> <p>12 editors?</p> <p>13 A. In that note he's also stating -- David</p> <p>14 DiCicco is also stating that he is not</p> <p>15 collaborating with --</p> <p>16 Q. Right.</p> <p>17 A. -- with the other --</p> <p>18 Q. But I want to make sure you understand,</p> <p>19 I'm not asking what a note says, I'm asking you</p> <p>20 as Lampo. How was Mr. Amos -- because this is</p> <p>21 what you fired him for, Lampo?</p> <p>22 A. Uh-huh.</p> <p>23 Q. You know, this is what -- so we need to</p> <p>24 know -- tell me every single way that Mr. Amos</p> <p>25 failed to corroborate -- is that what you said,</p>
<p style="text-align: right;">Page 107</p> <p>1 final write-up that he was proposing?</p> <p>2 A. The write-up would be based on his</p> <p>3 performance, lack of delivering on time.</p> <p>4 Q. So his humility?</p> <p>5 A. Lack of teamwork.</p> <p>6 Q. It would just be the one-time write-up</p> <p>7 about his -- about this deadline and --</p> <p>8 A. Missing deadlines, not collaborating, not</p> <p>9 being a team player.</p> <p>10 Q. Let's stop there a second. Tell me</p> <p>11 everything that Lampo claims evidenced that</p> <p>12 Mr. Amos was not a team player.</p> <p>13 A. So he was not a team player in how he</p> <p>14 collaborated with others.</p> <p>15 Q. Okay. Wait. Let's start one at a time.</p> <p>16 One, in how he collaborated with others, what</p> <p>17 did he do that indicated he was not a team</p> <p>18 player based on his collaboration with others?</p> <p>19 A. Now, he was not communicating properly or</p> <p>20 being open to suggestions from others.</p> <p>21 Q. Like who?</p> <p>22 A. Like the other video editors and</p> <p>23 videographers.</p> <p>24 Q. Did they complain?</p> <p>25 A. They did not, however -- well, let me</p>	<p style="text-align: right;">Page 109</p> <p>1 corroborated with others?</p> <p>2 A. Yes. So ultimately --</p> <p>3 Q. And then we go back, and then you said</p> <p>4 he's not communicating with other video</p> <p>5 editors, the first thing you said. Is that</p> <p>6 still true, is that he wasn't communicating</p> <p>7 with other video editors?</p> <p>8 A. So if I can go back to clarify?</p> <p>9 Q. Sure.</p> <p>10 A. So, ultimately, his termination was for</p> <p>11 insubordination with Luke LeFevre.</p> <p>12 Q. But what I'm asking about is how did he</p> <p>13 not collaborate, Lampo, tell, please, Company,</p> <p>14 how Mr. Amos did not collaborate with others</p> <p>15 while he was working there? And I don't -- I</p> <p>16 don't want you to just point me to an e-mail.</p> <p>17 I want you to just tell me because that's who</p> <p>18 you're here to testify for.</p> <p>19 A. That's true. But I'm here to testify</p> <p>20 what is -- what we did, which is written in</p> <p>21 that e-mail.</p> <p>22 Q. All right. Well, then, tell me what it</p> <p>23 is, everything he did, whether it's written or</p> <p>24 that you just know.</p> <p>25 A. Okay.</p>

<p style="text-align: right;">Page 110</p> <p>1 MS. SANDERS: Object to the form. He</p> <p>2 may answer.</p> <p>3 BY MR. STREET:</p> <p>4 Q. That's fine. You can answer.</p> <p>5 A. Yeah.</p> <p>6 Q. That he didn't corroborate with others.</p> <p>7 A. SO there was zero communication that</p> <p>8 would have included the team of people that he</p> <p>9 is working with.</p> <p>10 Q. Okay. What team members -- what team</p> <p>11 members that Mr. Amos was working with</p> <p>12 complained about his communications?</p> <p>13 A. If I said "complained," I did not mean</p> <p>14 complained because I don't believe that I</p> <p>15 said --</p> <p>16 Q. Okay.</p> <p>17 A. It wasn't other people complaining about</p> <p>18 him. It was the fact that he was not</p> <p>19 complaining with other team members. Had he</p> <p>20 been communicating, he wouldn't have been</p> <p>21 called out for zero communication.</p> <p>22 Q. Right. But no team member -- let's make</p> <p>23 sure I understand. No team member complained</p> <p>24 about his lack of communication?</p> <p>25 A. To my knowledge, no.</p>	<p style="text-align: right;">Page 112</p> <p>1 what?</p> <p>2 A. About the deadline that was about to be</p> <p>3 missed.</p> <p>4 Q. Okay. That's two.</p> <p>5 A. Or obstacles that he was faced with.</p> <p>6 Q. You're saying he didn't let Mr. DiCicco</p> <p>7 know of obstacles Mr. Amos was faced with?</p> <p>8 A. Yes.</p> <p>9 Q. What were those obstacles?</p> <p>10 MS. SANDERS: Object. He can answer.</p> <p>11 THE WITNESS: It's not spelled out.</p> <p>12 So in here what it says is that he broke trust</p> <p>13 by not communicating or anticipating the fact</p> <p>14 that he was not going to hit a deadline. So</p> <p>15 when David DiCicco was checking in with Brad</p> <p>16 Amos, Brad Amos was letting him believe that</p> <p>17 the project was on time. The project was, in</p> <p>18 fact, not on time, and the date prior to the</p> <p>19 video screen, that project was not ready.</p> <p>20 BY MR. STREET:</p> <p>21 Q. Okay. So you're saying his failure to</p> <p>22 communicate involved not knowing the progress,</p> <p>23 not letting Mr. LeFevre know about the deadline</p> <p>24 that was going to be missed. And was there</p> <p>25 anything else besides those things that</p>
<p style="text-align: right;">Page 111</p> <p>1 Q. And you're saying this lack of</p> <p>2 communication was amongst the team members?</p> <p>3 A. Yes; but also with his leader.</p> <p>4 Q. Okay. So, then, all right. That's one</p> <p>5 issue, was the lack of communication with team</p> <p>6 members that no one complained about.</p> <p>7 Two being his lack of communication with</p> <p>8 his leader; is that right?</p> <p>9 A. That's correct.</p> <p>10 Q. And who was his leader that you're</p> <p>11 talking about?</p> <p>12 A. David DiCicco.</p> <p>13 Q. Okay. So David DiCicco complained about</p> <p>14 him not communicating well?</p> <p>15 A. Correct.</p> <p>16 Q. How did he not communicate well with</p> <p>17 Mr. DiCicco?</p> <p>18 A. He did not let him know of the progress</p> <p>19 of the project he was working or how far along</p> <p>20 or deadlines that were about to be missed.</p> <p>21 Q. Okay. And is that it?</p> <p>22 A. Those are three specific points, yes.</p> <p>23 Q. Those two, okay. I'm unsure. All right.</p> <p>24 You said not -- not letting him know about the</p> <p>25 progress and then not letting him know about</p>	<p style="text-align: right;">Page 113</p> <p>1 Mr. Amos did not -- he was -- failed to</p> <p>2 corroborate?</p> <p>3 A. It was Mr. DiCicco, and, yes, he did not</p> <p>4 keep him informed of obstacles or progress or</p> <p>5 lack thereof.</p> <p>6 Q. Right. And that's what I'm asking: What</p> <p>7 specific obstacles are you talking about?</p> <p>8 A. It's whatever the obstacles were that</p> <p>9 were faced by Mr. Amos for --</p> <p>10 Q. What were they?</p> <p>11 A. -- not being able to complete the</p> <p>12 project.</p> <p>13 MS. SANDERS: Let him finish the</p> <p>14 question [sic], please.</p> <p>15 MR. STREET: That's okay.</p> <p>16 BY MR. STREET:</p> <p>17 Q. But what were those obstacles?</p> <p>18 MS. SANDERS: Objection. He may</p> <p>19 answer, if he knows.</p> <p>20 THE WITNESS: I don't know the answer</p> <p>21 to that question.</p> <p>22 BY MR. STREET:</p> <p>23 Q. Okay. You just assume there are some?</p> <p>24 A. I would assume that there would have to</p> <p>25 be some obstacles in order for Mr. Amos not to</p>

<p style="text-align: right;">Page 114</p> <p>1 do his work.</p> <p>2 Q. Okay. And does -- the only evidence I've</p> <p>3 heard today of Mr. Amos not doing this work is</p> <p>4 this deadline he missed?</p> <p>5 A. That is correct. That is part of it, but</p> <p>6 yes.</p> <p>7 (Simultaneous crosstalk.)</p> <p>8 Q. Okay. What are the other parts? What</p> <p>9 else did he fail to do?</p> <p>10 A. The other parts are where Lara Johnson</p> <p>11 has taken over.</p> <p>12 Q. Where what?</p> <p>13 A. The one-on-ones; where Lara Johnson says</p> <p>14 I'm taking over one-on-ones now so that we can</p> <p>15 try to get the corporate thinking out of him so</p> <p>16 that we can move things forward.</p> <p>17 Q. But, again, I mean, I have to keep coming</p> <p>18 back. This is something that you considered</p> <p>19 that you're telling me that you used to</p> <p>20 terminate him is that he couldn't get this</p> <p>21 corporate think out of his head?</p> <p>22 MS. SANDERS: Objection.</p> <p>23 BY MR. STREET:</p> <p>24 Q. Is that correct?</p> <p>25 A. That's one of the things that's listed in</p>	<p style="text-align: right;">Page 116</p> <p>1 terminated my client. So if they're not here</p> <p>2 today to tell me any of these facts, then it's</p> <p>3 probably not coming into evidence.</p> <p>4 BY MR. STREET:</p> <p>5 Q. So it's important that you remember as</p> <p>6 best as you can.</p> <p>7 MS. SANDERS: Objection, you can</p> <p>8 answer, if that was a question.</p> <p>9 THE WITNESS: I didn't catch the</p> <p>10 question.</p> <p>11 BY MR. STREET:</p> <p>12 Q. It's not a question. It's just that</p> <p>13 some -- explaining to the importance of</p> <p>14 remembering specific facts because the</p> <p>15 corporation is bound by your testimony today,</p> <p>16 correct?</p> <p>17 MS. SANDERS: He understands that.</p> <p>18 Please continue with your question.</p> <p>19 BY MR. STREET:</p> <p>20 Q. And the notice said -- the notice said,</p> <p>21 if you'll look at the notice, it says, all</p> <p>22 facts considered by Lampo when terminating our</p> <p>23 client.</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. So if you can't remember something</p>
<p style="text-align: right;">Page 115</p> <p>1 Lara --</p> <p>2 Q. But you can't --</p> <p>3 A. -- for one-on-ones.</p> <p>4 Q. Right. But you can't tell me what the</p> <p>5 corporate thinking was.</p> <p>6 A. It's the bureaucratic process --</p> <p>7 Q. You can't tell me.</p> <p>8 A. -- versus the relationship.</p> <p>9 Q. Explain that to me.</p> <p>10 A. So Ramsey is a very relational company,</p> <p>11 right. Part of humble-hungry-smart is we talk</p> <p>12 through that. So the corporate think that</p> <p>13 Lara's talking about is the red tape,</p> <p>14 bureaucratic, dot Is, cross Ts, do things on</p> <p>15 your own versus work collaboratively with other</p> <p>16 people.</p> <p>17 Q. What bureaucratically was Mr. Amos doing</p> <p>18 that was frowned upon by Lampo?</p> <p>19 MS. SANDERS: Object, outside the</p> <p>20 scope. He can answer.</p> <p>21 THE WITNESS: Yeah, I don't know the</p> <p>22 answer to that because it's not listed in here.</p> <p>23 MR. STREET: He testified -- I mean,</p> <p>24 I mean, he was noticed to testify to every</p> <p>25 single fact considered by Lampo when they</p>	<p style="text-align: right;">Page 117</p> <p>1 today, I'm going to assume it doesn't exist,</p> <p>2 okay?</p> <p>3 A. That's okay.</p> <p>4 Q. Okay. And what about this last sentence</p> <p>5 in this e-mail from Jack Galloway, "The only</p> <p>6 reason I'm not just suggesting to fire him now</p> <p>7 is that he'd be surprised by the firing," what</p> <p>8 does that mean?</p> <p>9 MS. SANDERS: Objection, he can</p> <p>10 answer, if he knows.</p> <p>11 MR. STREET: That's on the topic</p> <p>12 sheet.</p> <p>13 THE WITNESS: Yeah, I'm not sure why</p> <p>14 Jack would have written that, but my guess is</p> <p>15 he felt that Mr. Amos would be surprised.</p> <p>16 BY MR. STREET:</p> <p>17 Q. Okay. Well, he didn't want Mr. Amos to</p> <p>18 be surprised?</p> <p>19 A. That's correct. We don't want anyone to</p> <p>20 be surprised when they lose their job.</p> <p>21 Q. Okay. All right. Let's look at the</p> <p>22 e-mail below from Lara Johnson. She says, "I</p> <p>23 need to come in and talk with the HR Committee</p> <p>24 about the future of Brad Amos." Do you see</p> <p>25 that?</p>

<p style="text-align: right;">Page 118</p> <p>1 A. I see that.</p> <p>2 Q. It's an e-mail dated Monday, July 27th,</p> <p>3 3:23 p.m.</p> <p>4 A. Yes, sir.</p> <p>5 Q. "We had talked about him back in March."</p> <p>6 Okay. What did you talk about in March</p> <p>7 with Ms. Johnson? Who -- first of all, who is</p> <p>8 Ms. Johnson talking about? Who talked about</p> <p>9 him in March?</p> <p>10 A. The e-mail is addressed to HR Committee.</p> <p>11 Q. Okay.</p> <p>12 A. So she's referencing HR Committee talked</p> <p>13 about him back in March.</p> <p>14 Q. So the HR Committee did meet on Mr. Amos</p> <p>15 in March?</p> <p>16 A. That's what she's stating there.</p> <p>17 Q. Did they?</p> <p>18 A. I don't recall that.</p> <p>19 Q. Okay. What was said in this meeting in</p> <p>20 March about Mr. Amos?</p> <p>21 MS. SANDERS: Objection. He's</p> <p>22 already answered that.</p> <p>23 BY MR. STREET:</p> <p>24 Q. What was said in this meeting in March</p> <p>25 about Mr. Amos?</p>	<p style="text-align: right;">Page 120</p> <p>1 BY MR. STREET:</p> <p>2 Q. So you don't know?</p> <p>3 A. Correct.</p> <p>4 Q. And, again, I want to make sure I</p> <p>5 understand, too, when he says, "there are</p> <p>6 things I wish I knew before I took the job."</p> <p>7 Do you know what things he's referencing?</p> <p>8 A. I do not.</p> <p>9 Q. All right. Flip to the next page. We've</p> <p>10 got an e-mail from Luke LeFevre, and this looks</p> <p>11 like it was sent on 7/27 prior to</p> <p>12 Mr. Galloway's e-mail but also in response to</p> <p>13 Ms. Johnson's e-mail. Do you see where I'm</p> <p>14 talking about?</p> <p>15 A. Yes, I do.</p> <p>16 Q. All right. And Mr. LeFevre says, "I</p> <p>17 would like to come in and talk this through</p> <p>18 with you-all." Did Mr. LeFevre have everyone</p> <p>19 come in and talk this through with him?</p> <p>20 A. Did not.</p> <p>21 Q. He did not do that?</p> <p>22 A. No.</p> <p>23 Q. Why not?</p> <p>24 A. I'm not sure.</p> <p>25 Q. Now --</p>
<p style="text-align: right;">Page 119</p> <p>1 A. I don't recall that meeting.</p> <p>2 Q. So we don't know what she means when she</p> <p>3 says that.</p> <p>4 We don't -- when she says, "not much has</p> <p>5 changed," can you tell me what she was</p> <p>6 expecting to change?</p> <p>7 A. I would imagine that his behavior would</p> <p>8 have changed --</p> <p>9 Q. No, just tell me what you know --</p> <p>10 A. -- not his performance.</p> <p>11 Q. -- not what you're guessing, you're</p> <p>12 imagining, you're guessing. What do you know?</p> <p>13 A. The answer to your question is I don't</p> <p>14 recall what was discussed in March; hence, I</p> <p>15 can't make an assumption as to what didn't</p> <p>16 change.</p> <p>17 Q. Okay. And it says, "Mr." -- "Mr. Amos</p> <p>18 feels disappointed in several areas."</p> <p>19 What areas did Mr. Amos feel disappointed</p> <p>20 in?</p> <p>21 MS. SANDERS: Objection, asked and</p> <p>22 answered.</p> <p>23 THE WITNESS: They're not stated in</p> <p>24 the e-mail, so I'm not sure.</p> <p>25</p>	<p style="text-align: right;">Page 121</p> <p>1 A. Actually, if you go back to that, so Lara</p> <p>2 Johnson sends an e-mail 3:22 p.m. on July 27th,</p> <p>3 2020. Same day, 7/27/2020 at 8:23 p.m., Luke</p> <p>4 LeFevre sends, "I would like to" -- "I'd like</p> <p>5 us to come in and talk this through with</p> <p>6 you-all." Addressing to HR Committee.</p> <p>7 Q. Right. This is from Mr. LeFevre sent</p> <p>8 8:23 p.m. --</p> <p>9 A. Yeah. And on 8:21 p.m., a few minutes</p> <p>10 prior to Luke LeFevre sending it --</p> <p>11 Q. I don't see where you're reading from.</p> <p>12 A. It's the e-mail from Jack Galloway --</p> <p>13 Q. Okay.</p> <p>14 A. -- to Lara.</p> <p>15 Q. All right.</p> <p>16 A. So that is at 8:21 on the 28th, so the</p> <p>17 next day, correct?</p> <p>18 Q. Yes.</p> <p>19 A. Okay. So that is where Jack is</p> <p>20 responding now to Lara and Luke saying HRC does</p> <p>21 not meet. So you asked the question about did</p> <p>22 they come in --</p> <p>23 Q. I see.</p> <p>24 A. -- the answer is, no, they didn't come</p> <p>25 in.</p>

<p style="text-align: right;">Page 122</p> <p>1 Q. I see what you're saying.</p> <p>2 But it says, "Can you add it to the next</p> <p>3 week's agenda to come in and discuss it"?</p> <p>4 A. Right.</p> <p>5 Q. And was it added to the next week's</p> <p>6 agenda?</p> <p>7 A. I believe that Luke spoke to Mr. Amos</p> <p>8 prior to next week's agenda to the next week's</p> <p>9 HR Committee.</p> <p>10 Q. So was it put on the next week's agenda?</p> <p>11 A. I believe it was. If Jack says, "I'm</p> <p>12 adding it," then yes.</p> <p>13 Q. Where he says, "If you like, I can add</p> <p>14 you to next week's agenda;" he doesn't say he</p> <p>15 is adding it.</p> <p>16 A. Yeah, my guess is it was added.</p> <p>17 Q. So the committee did meet about Mr. Amos?</p> <p>18 A. I don't believe they met because by that</p> <p>19 point --</p> <p>20 Q. Again, I'm not asking what you think or</p> <p>21 guess. If you don't know, say you don't know.</p> <p>22 MS. SANDERS: Let him finish his</p> <p>23 answer, please.</p> <p>24 MR. STREET: Well, if his first thing</p> <p>25 is "I'm guessing," I want to stop him because</p>	<p style="text-align: right;">Page 124</p> <p>1 do, is notes, agenda?</p> <p>2 A. There would be an agenda.</p> <p>3 Q. Okay. And the agenda would be e-mailed</p> <p>4 out to everybody?</p> <p>5 A. It would be.</p> <p>6 Q. And if there wasn't an agenda that we</p> <p>7 received in discovery, is it fair to say that</p> <p>8 they didn't discuss it in one of these</p> <p>9 meetings?</p> <p>10 A. That's correct.</p> <p>11 Q. All right. Let's flip back to one of the</p> <p>12 e-mails on the back pages. And this one is</p> <p>13 from Luke LeFevre, 3/17. This is prior to</p> <p>14 these other e-mails, right? Yes. On</p> <p>15 March 17th, 2020.</p> <p>16 What -- first of all, let me ask this:</p> <p>17 What is this link to this Vimeo link?</p> <p>18 A. Down at the bottom?</p> <p>19 Q. Yes.</p> <p>20 A. From Jonna Covert?</p> <p>21 Q. Yes.</p> <p>22 A. The link is to a video that was being</p> <p>23 worked on by different people, but I don't know</p> <p>24 who it is.</p> <p>25 Q. Okay. Okay. And do you see the top</p>
<p style="text-align: right;">Page 123</p> <p>1 there's no point in guessing.</p> <p>2 MS. SANDERS: So you don't want --</p> <p>3 you don't want the company's guess, is that</p> <p>4 what you're saying?</p> <p>5 MR. STREET: I want to know what this</p> <p>6 man knows. I don't want to know what he</p> <p>7 guesses.</p> <p>8 MS. SANDERS: Okay. Fair enough.</p> <p>9 THE WITNESS: Then the answer is I</p> <p>10 don't know.</p> <p>11 BY MR. STREET:</p> <p>12 Q. Okay. Would there be records if they</p> <p>13 actually met? Would there be notes from a</p> <p>14 meeting, minutes typed up, anything like that?</p> <p>15 A. There would be a calendar invite.</p> <p>16 Q. And would there be notes or minutes or</p> <p>17 anything typed up after the event?</p> <p>18 A. Not typically.</p> <p>19 Q. So you don't keep records of what happens</p> <p>20 at these meetings?</p> <p>21 A. We do, but they're not a formal type --</p> <p>22 they're minutes. There might be notes just</p> <p>23 saying, "Here's the agenda, the topics that</p> <p>24 were covered."</p> <p>25 Q. Okay. Was that something you normally</p>	<p style="text-align: right;">Page 125</p> <p>1 e-mail there on this page from Luke LeFevre at</p> <p>2 11:06 p.m., and it says, "Shit. Hmmm. I'm</p> <p>3 worried about Brad Amos. I think his wife is</p> <p>4 crazy. Let's leave it for tonight."</p> <p>5 Okay. Let's break this down. Why did</p> <p>6 Mr. LeFevre think that Brad's wife was crazy?</p> <p>7 A. You would have to ask him.</p> <p>8 MS. SANDERS: Objection.</p> <p>9 BY MR. STREET:</p> <p>10 Q. The company had no opinion on whether</p> <p>11 Mrs. Amos was crazy or not?</p> <p>12 A. I did not, and I don't want to speculate</p> <p>13 as to why Mr. LeFevre felt that way.</p> <p>14 Q. Okay. Was there anyone else, whoever</p> <p>15 mentioned it, that they thought his wife was</p> <p>16 crazy?</p> <p>17 A. Not to my knowledge.</p> <p>18 Q. Okay. Did you ever hear of anyone else?</p> <p>19 Did anyone ever complain to anyone at Lampo</p> <p>20 that Mrs. Amos was disruptive, acting crazy as</p> <p>21 they said? Anything like that?</p> <p>22 A. Not to my knowledge.</p> <p>23 Q. So as far as you know, this is the only</p> <p>24 complaint that there was about Mr. Amos's wife</p> <p>25 is this e-mail?</p>

<p style="text-align: right;">Page 126</p> <p>1 A. To my knowledge, yes.</p> <p>2 Q. Okay. All right. Let's put those up for</p> <p>3 just a second.</p> <p>4 All right. Lampo terminated Mr. Amos,</p> <p>5 did they not?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And Topic No. 4 on here asks Lampo</p> <p>8 to "discuss all facts considered by Lampo when</p> <p>9 making this decision to terminate plaintiff."</p> <p>10 So why don't you tell me -- every single</p> <p>11 fact -- that Lampo considered when they</p> <p>12 terminated Mr. Amos?</p> <p>13 A. So the facts that were considered for a</p> <p>14 conversation with him --</p> <p>15 Q. No, no. That's not my question.</p> <p>16 A. Okay.</p> <p>17 Q. My question was every single -- let me</p> <p>18 know if you need me to repeat it, but the</p> <p>19 question is not something about conversations,</p> <p>20 it's not something about goals, it's something</p> <p>21 about this: What facts, every single fact, was</p> <p>22 considered by Lampo when they made the decision</p> <p>23 to terminate Mr. Amos?</p> <p>24 A. His termination was due to the</p> <p>25 insubordination by him --</p>	<p style="text-align: right;">Page 128</p> <p>1 A. He basically said to Mr. LeFevre you're</p> <p>2 the last person to speak to me about humility,</p> <p>3 you lack humility, you're arrogant, you come</p> <p>4 across this way.</p> <p>5 Q. Okay. So that was why he got fired,</p> <p>6 because he talked to Mr. LeFevre that way?</p> <p>7 A. Yes.</p> <p>8 Q. And that was the only reason he was</p> <p>9 fired?</p> <p>10 A. The conversation leading up to that was</p> <p>11 his performance --</p> <p>12 Q. Okay. I'm asking about every single</p> <p>13 fact, okay, not just -- let me finish, please.</p> <p>14 MS. SANDERS: Let him finish.</p> <p>15 BY MR. STREET:</p> <p>16 Q. Every single fact and then not just the</p> <p>17 end, okay? Do you understand what I'm saying?</p> <p>18 A. I understand what you're saying, but</p> <p>19 that's not what --</p> <p>20 Q. Right.</p> <p>21 A. -- you said earlier.</p> <p>22 Q. Well, I want to know every single fact</p> <p>23 they considered.</p> <p>24 A. Cool.</p> <p>25 Q. It is what I said several times.</p>
<p style="text-align: right;">Page 127</p> <p>1 Q. Insubordination?</p> <p>2 A. -- to Mr. Luke LeFevre.</p> <p>3 Q. And that was it?</p> <p>4 A. That's correct.</p> <p>5 Q. Okay. What facts -- what actually</p> <p>6 happened to show that it was insubordination?</p> <p>7 A. Mr. LeFevre and Ms. Johnson had a</p> <p>8 conversation with him.</p> <p>9 Q. Okay.</p> <p>10 A. They were speaking to him about his</p> <p>11 performance.</p> <p>12 Q. What day was this conversation?</p> <p>13 A. I would need to reference some documents.</p> <p>14 Q. Well, who was present at this?</p> <p>15 A. It was Mr. Amos's last day with the</p> <p>16 company, and present was Lara Johnson, Luke</p> <p>17 LeFevre, and Brad Amos.</p> <p>18 Q. Okay. And what did Mr. Amos do that was</p> <p>19 insubordinate?</p> <p>20 A. He was insubordinate to Luke LeFevre when</p> <p>21 he was trying to have a corrective conversation</p> <p>22 about his behavior --</p> <p>23 Q. How --</p> <p>24 A. -- and his humility.</p> <p>25 Q. How was he insubordinate?</p>	<p style="text-align: right;">Page 129</p> <p>1 MS. SANDERS: Objection, you've asked</p> <p>2 him, he answered it.</p> <p>3 THE WITNESS: So --</p> <p>4 BY MR. STREET:</p> <p>5 Q. So there's no more facts than what you</p> <p>6 just told me that was considered, and that's</p> <p>7 the only things they considered when they fired</p> <p>8 him?</p> <p>9 A. That's correct.</p> <p>10 Q. Was this, that he talked back to</p> <p>11 Mr. LeFevre?</p> <p>12 A. Yes. He was insubordinate.</p> <p>13 Q. And that was it; he was fired; nothing</p> <p>14 else to do?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. He wasn't fired because of his job</p> <p>17 performance?</p> <p>18 A. That's what led to the conversation.</p> <p>19 Q. But he wasn't fired because of his job</p> <p>20 performance?</p> <p>21 A. Ultimately, no. He would have been given</p> <p>22 an option to go on a performance improvement</p> <p>23 plan or take a severance. It would have still</p> <p>24 been Mr. Amos's choice at that point.</p> <p>25 Q. Okay.</p>

<p style="text-align: right;">Page 130</p> <p>1 A. The fact that he was insubordinate --</p> <p>2 Q. Right.</p> <p>3 A. -- led to his termination.</p> <p>4 Q. But you didn't consider his work</p> <p>5 performance at all when you decided to make the</p> <p>6 termination?</p> <p>7 A. Those things led to the conversation to</p> <p>8 be put on either a performance improvement</p> <p>9 plan --</p> <p>10 Q. I know you keep saying that, but I'm</p> <p>11 asking you was his work performance considered</p> <p>12 at all in making -- in determining to fire</p> <p>13 Mr. Amos?</p> <p>14 A. The conversation would not have been</p> <p>15 had --</p> <p>16 Q. No.</p> <p>17 A. -- had he not --</p> <p>18 MS. SANDERS: Objection. He's</p> <p>19 answering, maybe not the way you want him to,</p> <p>20 but he's answering the question.</p> <p>21 MR. STREET: No, he's not.</p> <p>22 BY MR. STREET:</p> <p>23 Q. Listen to what I am saying. I'm asking</p> <p>24 you what was considered. I'm not asking you</p> <p>25 about any kind of conversation, I'm not asking</p>	<p style="text-align: right;">Page 132</p> <p>1 BY MR. STREET:</p> <p>2 Q. Okay. What aspect of his work</p> <p>3 performance was considered?</p> <p>4 A. All of the aspects of his work</p> <p>5 performance including his teamwork, lack of</p> <p>6 collaboration, and missing deadlines. All of</p> <p>7 those things were what led to that day with</p> <p>8 Mr. Amos and Luke LeFevre being in the same</p> <p>9 room --</p> <p>10 Q. Okay.</p> <p>11 A. -- including Lara Johnson.</p> <p>12 Q. All right. So now we've got the facts</p> <p>13 you considered before when making the decision</p> <p>14 to terminate him was his -- he smarted off to</p> <p>15 Luke LeFevre in a meeting, his lack of</p> <p>16 collaboration was -- we'll get into some actual</p> <p>17 facts there on this in a second, and third</p> <p>18 thing you said was missing deadlines?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. And is there any other facts</p> <p>21 considered -- anything -- about Lampo that went</p> <p>22 into the determination to fire Mr. Amos?</p> <p>23 A. There was not.</p> <p>24 Q. Okay. So his lack of collaboration --</p> <p>25 and I think I established -- we established</p>
<p style="text-align: right;">Page 131</p> <p>1 about any conversation, so don't start your</p> <p>2 answer with "This conversation."</p> <p>3 MS. SANDERS: Objection.</p> <p>4 BY MR. STREET:</p> <p>5 Q. I'm asking you what facts were considered</p> <p>6 by Lampo when they terminated Mr. Amos. And</p> <p>7 I'm asking you if one of those facts was his</p> <p>8 work performance. Because you just told me the</p> <p>9 only thing considered was his insubordination</p> <p>10 when he smarted off to Mr. LeFevre, that his</p> <p>11 work performance wasn't part of why he was</p> <p>12 terminated; am I correct?</p> <p>13 A. The piece you're missing, and maybe I'm</p> <p>14 not being clear, is that that -- they would not</p> <p>15 have been having -- Mr. LeFevre, Lara Johnson,</p> <p>16 and Brad Amos would not have been in that room</p> <p>17 were it not for his performance --</p> <p>18 Q. When Lampo --</p> <p>19 A. -- or lack thereof.</p> <p>20 Q. -- made the decision to terminate</p> <p>21 Mr. Amos, did they consider his work</p> <p>22 performance?</p> <p>23 A. Yes.</p> <p>24 MS. SANDERS: Objection.</p> <p>25</p>	<p style="text-align: right;">Page 133</p> <p>1 earlier there was no coworkers who complained</p> <p>2 about Mr. Amos's lack of collaboration; fair to</p> <p>3 say?</p> <p>4 MS. SANDERS: Objection.</p> <p>5 MR. STREET: You can answer.</p> <p>6 THE WITNESS: To my knowledge, that's</p> <p>7 correct.</p> <p>8 BY MR. STREET:</p> <p>9 Q. And as Lampo sits here today, you can't</p> <p>10 tell me of any.</p> <p>11 Okay. Who was the lack of collaboration</p> <p>12 with, then? Was it just Mr. LeFevre?</p> <p>13 A. It was Mr. DiCicco.</p> <p>14 Q. Mr. DiCicco.</p> <p>15 And was the lack of collaboration because</p> <p>16 he -- because Mr. DiCicco indicated that the</p> <p>17 deadline -- that there was some -- some</p> <p>18 misleading information provided on the</p> <p>19 deadline?</p> <p>20 A. There was not only missing information,</p> <p>21 there was a sense that things were okay when</p> <p>22 they were not.</p> <p>23 Q. Okay.</p> <p>24 A. And in the position that Mr. Amos held,</p> <p>25 it wasn't acting by himself, he was leading a</p>

<p style="text-align: right;">Page 134</p> <p>1 group of people to do that; hence, the lack of</p> <p>2 collaboration with the other team. They didn't</p> <p>3 complain about him.</p> <p>4 Q. What other team?</p> <p>5 A. So he was leading other editors and</p> <p>6 working -- he wasn't working by himself.</p> <p>7 Q. Who were the other editors he were -- was</p> <p>8 leading?</p> <p>9 A. I'd have to go back and look at my notes,</p> <p>10 but I'm not -- he was working with other</p> <p>11 editors to provide a product.</p> <p>12 Q. But you can't tell me their names?</p> <p>13 A. I know one of them would have probably</p> <p>14 been Dennis.</p> <p>15 Q. Dennis who?</p> <p>16 A. That would be Dennis that was listed</p> <p>17 prior. His last name is Warren; Dennis Warren.</p> <p>18 Q. Okay. And this would have been, I guess,</p> <p>19 Mr. Amos being a senior video producer;</p> <p>20 Mr. Warren would have been just a video</p> <p>21 producer?</p> <p>22 MS. SANDERS: Objection.</p> <p>23 THE WITNESS: At that time, yes.</p> <p>24 BY MR. STREET:</p> <p>25 Q. Okay. Who else besides Dennis Warren was</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. Okay.</p> <p>2 A. -- for being insubordinate.</p> <p>3 Q. But Mr. LeFevre never informed anyone</p> <p>4 else what was said to him?</p> <p>5 A. He did inform us what was said, but I</p> <p>6 don't recall it verbatim.</p> <p>7 Q. Okay. So this -- whatever he said to</p> <p>8 Mr. LeFevre that upset Mr. LeFevre and his lack</p> <p>9 of collaboration, that's the reasons he was</p> <p>10 fired, that's it?</p> <p>11 A. Including missing deadlines, yes.</p> <p>12 Q. Including missing deadlines.</p> <p>13 What deadline did he miss?</p> <p>14 A. So we talked about the one that he</p> <p>15 missed, but according to Lara Johnson, he</p> <p>16 missed other things.</p> <p>17 Q. Okay. What does -- what other things did</p> <p>18 he miss?</p> <p>19 A. There were other video projects that he</p> <p>20 was not quick to produce.</p> <p>21 Q. Like what?</p> <p>22 A. I don't have the specifics for you.</p> <p>23 Q. Do you know what they were about? Do you</p> <p>24 know anything about them?</p> <p>25 A. There were video edit projects, which is</p>
<p style="text-align: right;">Page 135</p> <p>1 Mr. Amos supervising on these projects?</p> <p>2 MS. SANDERS: Objection.</p> <p>3 THE WITNESS: Not that I can</p> <p>4 remember.</p> <p>5 BY MR. STREET:</p> <p>6 Q. No one that you can tell me?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. So what else -- what other facts</p> <p>9 indicated that Mr. Amos had a lack of</p> <p>10 collaboration that you haven't told me about</p> <p>11 today?</p> <p>12 A. None that we haven't discussed.</p> <p>13 Q. Okay. What specifically did Mr. Amos say</p> <p>14 to Mr. LeFevre when he was insubordinate?</p> <p>15 MS. SANDERS: Objection, he may</p> <p>16 answer.</p> <p>17 THE WITNESS: I wasn't in the room,</p> <p>18 so I do not know specifically what he said.</p> <p>19 BY MR. STREET:</p> <p>20 Q. But you fired him over it?</p> <p>21 A. But I do know --</p> <p>22 That's correct.</p> <p>23 Q. So you didn't take the time to find out?</p> <p>24 A. He was terminated by Luke LeFevre on the</p> <p>25 spot --</p>	<p style="text-align: right;">Page 137</p> <p>1 what he was hired to do.</p> <p>2 Q. Okay. But as you sit here today, does --</p> <p>3 they -- talk about all facts considered when</p> <p>4 you terminated him, you can't tell me a single</p> <p>5 one he missed other than this documentary?</p> <p>6 A. Yeah, so all facts considered when he was</p> <p>7 terminated is a very broad term.</p> <p>8 Q. It is.</p> <p>9 A. And the facts that led to LeFevre and</p> <p>10 Lara sitting down to speak with him would have</p> <p>11 not led to the term- -- they would have led to</p> <p>12 a performance improvement or a separation.</p> <p>13 Q. Was there a performance improvement plan</p> <p>14 offered to Mr. Amos?</p> <p>15 A. It did not get to that point.</p> <p>16 Q. Because you fired him before that?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. So -- so, again, I guess I'm just</p> <p>19 confused. If you're -- just keep saying, Well,</p> <p>20 these video deadlines weren't the reason we</p> <p>21 fired him -- am I saying that right? Or they</p> <p>22 were the reason you fired him?</p> <p>23 A. So you're -- you're correct and you're</p> <p>24 not because they're the reason that the</p> <p>25 conversation was had. The reason he was</p>

<p style="text-align: right;">Page 138</p> <p>1 terminated was because of insubordination in</p> <p>2 that conversation. So it was a performance</p> <p>3 conversation that became a termination based on</p> <p>4 Mr. Amos's response.</p> <p>5 Q. Okay. And what was said in this</p> <p>6 conversation?</p> <p>7 A. Again, I was not in the room.</p> <p>8 Q. All right. But the topic -- again, I</p> <p>9 want to read a topic here for you: "All</p> <p>10 communications between employees of defendant</p> <p>11 occurring between May 2019 and August 2020</p> <p>12 related to its decision to terminate</p> <p>13 plaintiff."</p> <p>14 MS. SANDERS: And I restate the</p> <p>15 objection that I've already provided in</p> <p>16 writing.</p> <p>17 BY MR. STREET:</p> <p>18 Q. And you heard that, right? You heard</p> <p>19 what I just head?</p> <p>20 A. Yes.</p> <p>21 Q. So as a corporation, you can't sit here</p> <p>22 and tell me what was said in this meeting</p> <p>23 between Mr. LeFevre, Brad Amos -- and who was</p> <p>24 the third person? I forget the name.</p> <p>25 A. Lara Johnson.</p>	<p style="text-align: right;">Page 140</p> <p>1 have the right to make recommendations, usually</p> <p>2 reviewed by HR Committee, but a board member</p> <p>3 would also have that authority.</p> <p>4 Q. Okay. Well, in this particular case, did</p> <p>5 Mr. LeFevre fire Mr. Amos on the spot?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. So he didn't have to go to</p> <p>8 committee or anything?</p> <p>9 A. That's correct.</p> <p>10 Q. Okay. So he has the authority to just</p> <p>11 fire people as well?</p> <p>12 A. Yes. He's a board member.</p> <p>13 Q. Okay. He is a board member?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. What's his title on the board?</p> <p>16 A. He was the chief creative officer.</p> <p>17 Q. So, again, just looking at our topic</p> <p>18 here, when you said "All persons making either</p> <p>19 recommendation or decision that the plaintiff</p> <p>20 be terminated," the only person who made this</p> <p>21 determination was Luke LeFevre?</p> <p>22 A. That's correct.</p> <p>23 Q. No one else had any input?</p> <p>24 A. Input came from David DiCicco and Lara</p> <p>25 Johnson.</p>
<p style="text-align: right;">Page 139</p> <p>1 Q. -- Lara Johnson, you can't tell me what</p> <p>2 was said in that meeting?</p> <p>3 A. We provided in discovery -- written</p> <p>4 discovery --</p> <p>5 Q. No, no. I'm asking you today can you</p> <p>6 tell me what was said in that meeting?</p> <p>7 A. We've provided it to you.</p> <p>8 Q. Can you tell me as you sit here today</p> <p>9 what was said in that meeting?</p> <p>10 A. Not verbatim, no.</p> <p>11 Q. Can you tell me at all, not verbatim,</p> <p>12 just tell me what they discussed?</p> <p>13 A. I can tell you that he was insubordinate</p> <p>14 when they were discussing his performance or</p> <p>15 lack thereof, and that led to his termination.</p> <p>16 Q. But, again, you can't tell me what</p> <p>17 specifically he said that was insubordinate;</p> <p>18 fair to say?</p> <p>19 MS. SANDERS: Objection, asked and</p> <p>20 answered.</p> <p>21 THE WITNESS: Fair to say.</p> <p>22 BY MR. STREET:</p> <p>23 Q. Okay. Who was the authority at Lampo to</p> <p>24 make termination decisions?</p> <p>25 A. So HR Committee and leaders. Leaders</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. Okay.</p> <p>2 A. But the decision was made by Luke</p> <p>3 LeFevre.</p> <p>4 Q. Okay. And it was made on the spot in</p> <p>5 this meeting?</p> <p>6 A. Correct.</p> <p>7 Q. Now, did anyone ever look into any</p> <p>8 complaints Mr. Amos had about the workplace?</p> <p>9 A. I'm not aware of any complaints that</p> <p>10 Mr. Amos made about the workplace.</p> <p>11 Q. Okay. So no -- not that you know of?</p> <p>12 A. I'm not aware of any complaints made by</p> <p>13 Mr. Amos.</p> <p>14 Q. Were there any kind of investigations</p> <p>15 conducted by Lampo at all based on anything</p> <p>16 Mr. Amos claimed while working there?</p> <p>17 MS. SANDERS: Objection to the extent</p> <p>18 it calls for attorney-client information.</p> <p>19 BY MR. STREET:</p> <p>20 Q. We can just ask [sic] them if they have</p> <p>21 them, you don't have to tell me what was said.</p> <p>22 A. I'm not aware that he made any</p> <p>23 allegations or claims.</p> <p>24 Q. Okay. Did he complain about COVID at</p> <p>25 all?</p>

<p style="text-align: right;">Page 142</p> <p>1 A. He did not.</p> <p>2 Q. Okay. What did you review before</p> <p>3 testifying here today?</p> <p>4 MS. SANDERS: Objection to the extent</p> <p>5 it calls for attorney-client privileged</p> <p>6 information.</p> <p>7 BY MR. STREET:</p> <p>8 Q. What documents did you review before you</p> <p>9 testified?</p> <p>10 A. Everything we turned in to you, all the</p> <p>11 written discoveries.</p> <p>12 Q. What else?</p> <p>13 A. To my knowledge, that was it.</p> <p>14 Q. Okay. Did you speak to anyone about your</p> <p>15 testimony today besides your attorney?</p> <p>16 A. Did not.</p> <p>17 Q. And by attorney, I mean Leslie; not an</p> <p>18 attorney, this attorney.</p> <p>19 A. We have two attorneys. We have Leslie,</p> <p>20 and we have Daniel Cortez. That is the company</p> <p>21 attorney.</p> <p>22 Q. Right. Mr. Cortez on this case, or is he</p> <p>23 only in-house counsel?</p> <p>24 MS. SANDERS: Objection, outside the</p> <p>25 scope.</p>	<p style="text-align: right;">Page 144</p> <p>1 BY MR. STREET:</p> <p>2 Q. Sure.</p> <p>3 Say someone complains, like the O'Connor</p> <p>4 case, of Title VII violation or in this case</p> <p>5 Title VII violation, who leads up the</p> <p>6 investigation into what happened?</p> <p>7 A. That would be a combination of HR with</p> <p>8 legal.</p> <p>9 Q. Okay. But it goes automatically to legal</p> <p>10 when someone -- when they do any investigation?</p> <p>11 A. It would be both, yes.</p> <p>12 Q. Okay. And that's what I'm getting at.</p> <p>13 Is that Lampo's policy? It's not, hey, let's</p> <p>14 try to figure it out first; let's get the</p> <p>15 lawyers involved first?</p> <p>16 A. It's not a policy. It's more of a</p> <p>17 practice because we have very few complaints.</p> <p>18 So if someone is making a Title 7 complaint,</p> <p>19 that is so few and far between --</p> <p>20 Q. Right.</p> <p>21 A. -- that we would go to our attorney.</p> <p>22 Q. Okay. Well, what do you call a policy or</p> <p>23 practice -- that is the practice of Lampo when</p> <p>24 you get a complaint is to hand it off to legal</p> <p>25 immediately and not do any kind of</p>
<p style="text-align: right;">Page 143</p> <p>1 THE WITNESS: They're both attorneys.</p> <p>2 BY MR. STREET:</p> <p>3 Q. Okay. Do the attorneys at Lampo</p> <p>4 investigate a lot of termination? Do the</p> <p>5 in-house attorneys do they perform the</p> <p>6 investigations at Lampo?</p> <p>7 A. We have not had investigations at Lampo</p> <p>8 over -- that have been investigated.</p> <p>9 Q. What about -- what about the O'Connor</p> <p>10 case, who investigated that?</p> <p>11 MS. SANDERS: Objection, outside the</p> <p>12 scope.</p> <p>13 BY MR. STREET:</p> <p>14 Q. Who investigated that?</p> <p>15 A. The O'Connor case was investigated by --</p> <p>16 by myself and my team, the HR team, at the</p> <p>17 request of legal counsel.</p> <p>18 Q. And is that the way all these</p> <p>19 investigations are handled by legal -- is legal</p> <p>20 involved in all of the investigations at Lampo</p> <p>21 when it comes to employment-related matters?</p> <p>22 MS. SANDERS: Objection. He can</p> <p>23 answer if he knows.</p> <p>24 THE WITNESS: Can you clarify your</p> <p>25 question?</p>	<p style="text-align: right;">Page 145</p> <p>1 investigation through HR?</p> <p>2 MS. SANDERS: Objection.</p> <p>3 THE WITNESS: It would be to do both,</p> <p>4 so they happen at the same time.</p> <p>5 BY MR. STREET:</p> <p>6 Q. So the legal is involved the entire time?</p> <p>7 A. Correct.</p> <p>8 Q. Now, other than this meeting when</p> <p>9 Mr. Amos allegedly smarted off to Mr. LeFevre,</p> <p>10 you can't sit and tell me any other facts</p> <p>11 considered by Lampo to terminate other than</p> <p>12 that?</p> <p>13 A. Other than what was in discovery, no.</p> <p>14 Q. No, I'm asking what were the other facts</p> <p>15 besides that, tell me right now.</p> <p>16 MS. SANDERS: Objection, asked and</p> <p>17 answered.</p> <p>18 THE WITNESS: The other facts were in</p> <p>19 the discovery.</p> <p>20 BY MR. STREET:</p> <p>21 Q. No, but as you sit here today what were</p> <p>22 those other facts?</p> <p>23 A. It was his performance that led to that</p> <p>24 conversation. So his lack of performance led</p> <p>25 to a conversation with Luke LeFevre and Lara</p>

<p style="text-align: right;">Page 146</p> <p>1 Johnson. Those were the facts.</p> <p>2 Q. Okay. Does Ramsey have any sort of a</p> <p>3 policy or procedure, like a verbal warning?</p> <p>4 You know, different companies have different</p> <p>5 things they go through, verbal warning, written</p> <p>6 warning.</p> <p>7 A. Not formally, no.</p> <p>8 Q. There's no discipline policy at Lampo?</p> <p>9 A. There is not.</p> <p>10 Q. So they can fire who they want for what</p> <p>11 they want; fair to say?</p> <p>12 A. So long as it doesn't fall under</p> <p>13 discriminatory practices, yes. We're an</p> <p>14 employment-at-will state.</p> <p>15 Q. How many people -- Strike that.</p> <p>16 Was there any investigation performed by</p> <p>17 Lampo as a result of any complaints lodged by</p> <p>18 Mr. Amos regarding his employment at Lampo?</p> <p>19 MS. SANDERS: Objection to the extent</p> <p>20 it calls for attorney-client privileged</p> <p>21 information.</p> <p>22 THE WITNESS: Prior to his filing or</p> <p>23 after his filing?</p> <p>24 BY MR. STREET:</p> <p>25 Q. Either.</p>	<p style="text-align: right;">Page 148</p> <p>1 counsel, not from me.</p> <p>2 Q. Okay. So you have a copy of that?</p> <p>3 A. Yes.</p> <p>4 MR. STREET: Okay. We'd like to see</p> <p>5 that.</p> <p>6 MS. SANDERS: Objection, privileged,</p> <p>7 but we can take that up after.</p> <p>8 MR. STREET: Well, that's pretty</p> <p>9 custom -- customary allegedly to give us those.</p> <p>10 BY MR. STREET:</p> <p>11 Q. When was that sent, your e-mail? I guess</p> <p>12 it was not from you, it was from the legal</p> <p>13 counsel?</p> <p>14 A. Correct.</p> <p>15 Q. In-house counsel?</p> <p>16 A. Yes.</p> <p>17 Q. And what did it say?</p> <p>18 MS. SANDERS: Objection. He can't</p> <p>19 answer that. We're taking the position it's</p> <p>20 privileged.</p> <p>21 MR. STREET: A letter -- a holding</p> <p>22 letter is privileged?</p> <p>23 MS. SANDERS: From the general</p> <p>24 counsel. We can take that up, and if -- if you</p> <p>25 convince me it's not privileged, you can see</p>
<p style="text-align: right;">Page 147</p> <p>1 A. After his filing.</p> <p>2 Q. His filing where?</p> <p>3 A. His filing through you, lawsuit.</p> <p>4 Q. To the EEOC?</p> <p>5 A. That came after you.</p> <p>6 Q. Okay. What happened -- I mean -- tell</p> <p>7 me -- don't tell me necessarily what you did,</p> <p>8 but tell me how that investigation came to be.</p> <p>9 A. We received your notice of a lawsuit, we</p> <p>10 contact -- I believe that came to me, I brought</p> <p>11 our attorney in the fold, and then we began the</p> <p>12 investigation.</p> <p>13 Q. Okay. While we're there, let me ask you</p> <p>14 something, too. When you got it, you said --</p> <p>15 did you get a copy of the lawsuit and that's</p> <p>16 what started it, or was it a letter?</p> <p>17 A. I believe it was a copy of the lawsuit.</p> <p>18 Q. Okay. What did you do after that to tell</p> <p>19 employees to make sure they held on to</p> <p>20 potential evidence? Did you send an e-mail out</p> <p>21 to everybody and say, "Hey, don't throw</p> <p>22 anything away"?</p> <p>23 A. That is correct.</p> <p>24 Q. Okay.</p> <p>25 A. And it actually came from our general</p>	<p style="text-align: right;">Page 149</p> <p>1 it.</p> <p>2 MR. STREET: It's not privileged. I</p> <p>3 get it in every lawsuit. And, I know, the</p> <p>4 rules don't apply to Lampo --</p> <p>5 MS. SANDERS: I can't speak to those</p> <p>6 lawsuits.</p> <p>7 MR. STREET: -- so I forgot.</p> <p>8 BY MR. STREET:</p> <p>9 Q. Ask let's get back and say what was</p> <p>10 Lampo's policy when COVID-19 first hit? What</p> <p>11 did they do as a result of COVID-19?</p> <p>12 A. We shut down and sent everybody home same</p> <p>13 as everybody else.</p> <p>14 Q. Did you shut down immediately?</p> <p>15 A. We shut down when we had the first case.</p> <p>16 Q. The first case at the office?</p> <p>17 A. Correct.</p> <p>18 Q. All right. When was that?</p> <p>19 A. That was sometime in March. I can't</p> <p>20 recall the exact date, but it was sometime in</p> <p>21 March.</p> <p>22 Q. And prior to that, did you take any kind</p> <p>23 of precautions at all?</p> <p>24 A. We had taken the CDC precautions. We had</p> <p>25 started cleaning the building, providing hand</p>

<p style="text-align: right;">Page 150</p> <p>1 sanitizers.</p> <p>2 Q. Okay. When did they do that?</p> <p>3 A. It would have been sometime in March as</p> <p>4 well.</p> <p>5 Q. What other -- you said there's hand</p> <p>6 sanitizer. What other steps did you take?</p> <p>7 A. We followed the guidelines provided by</p> <p>8 the CDC.</p> <p>9 Q. Okay. What were they?</p> <p>10 A. I don't recall them off the top of my</p> <p>11 head, and they changed drastically sometimes</p> <p>12 week by week, sometimes hour by hour.</p> <p>13 Q. Okay. But as you sit here today, you</p> <p>14 can't tell me what the first precautions Ramsey</p> <p>15 took other than hand sanitizer?</p> <p>16 A. Hand sanitizer, 6 feet of distance, no</p> <p>17 collective gathering. There was a lot of</p> <p>18 things, but all of those things that I'm</p> <p>19 mentioning, I don't recall the order that they</p> <p>20 happened in.</p> <p>21 Q. Who made the determination at Ramsey</p> <p>22 whether an employee was an essential worker or</p> <p>23 not?</p> <p>24 A. The determination was actually made by</p> <p>25 Governor Lee that said these are the jobs that</p>	<p style="text-align: right;">Page 152</p> <p>1 your client questions.</p> <p>2 MS. SANDERS: Well, I get to state my</p> <p>3 objection. That's --</p> <p>4 MR. STREET: Are you -- there's an</p> <p>5 objection or is there --</p> <p>6 MS. SANDERS: There's an objection.</p> <p>7 I objected to the previous --</p> <p>8 MR. STREET: Okay. Well, then, let's</p> <p>9 start with objection and tell me what you're</p> <p>10 objecting to.</p> <p>11 MS. SANDERS: I would appreciate if</p> <p>12 you'd let me finish because I'm definitely</p> <p>13 letting you finish.</p> <p>14 MR. STREET: That's fine if you'd</p> <p>15 like to finish, but I don't want you telling</p> <p>16 him what to answer.</p> <p>17 MS. SANDERS: I'm not telling him</p> <p>18 what to answer. I'm restating my objection,</p> <p>19 which I stated earlier to you in writing, and</p> <p>20 I'm restating it today, for the record.</p> <p>21 Defendant's COVID-19 response is broad.</p> <p>22 I asked you to narrow it. You refused. He's</p> <p>23 here the best he can to answer your questions.</p> <p>24 BY MR. STREET:</p> <p>25 Q. So as you sit here today to testify as to</p>
<p style="text-align: right;">Page 151</p> <p>1 he would consider essential jobs and not.</p> <p>2 Broadcast and radio were essential jobs.</p> <p>3 Q. Okay.</p> <p>4 A. And so those were the people that we</p> <p>5 allowed to come back in. And, again, that was</p> <p>6 a voluntary measure.</p> <p>7 Q. Right. Well, was that just people who</p> <p>8 worked in the video department?</p> <p>9 A. People that worked in video or broadcast,</p> <p>10 YouTube channel, IT, technology; some certain</p> <p>11 number of people to be able to broadcast a</p> <p>12 radio show.</p> <p>13 Q. So how many people were -- were</p> <p>14 considered essential employees at Lampo?</p> <p>15 MS. SANDERS: Objection, outside the</p> <p>16 scope. He can answer if he knows.</p> <p>17 THE WITNESS: I don't know an exact</p> <p>18 number.</p> <p>19 BY MR. STREET:</p> <p>20 Q. Okay. Again, one of the topics we expect</p> <p>21 you to testify here today is defendant's</p> <p>22 COVID-19 response.</p> <p>23 MS. SANDERS: And we provided you the</p> <p>24 information --</p> <p>25 MR. STREET: And, again, I'm asking</p>	<p style="text-align: right;">Page 153</p> <p>1 Lampo's COVID response, you can't tell me how</p> <p>2 many employees were considered exempt</p> <p>3 employees?</p> <p>4 A. Correct.</p> <p>5 Q. Was everyone considered an exempt</p> <p>6 employee just the fact they worked at Lampo?</p> <p>7 A. No.</p> <p>8 Q. Okay. Who was not considered an exempt</p> <p>9 employee? What type of employee would not be</p> <p>10 considered?</p> <p>11 A. HR.</p> <p>12 Q. Okay. So the mere fact that your company</p> <p>13 has a -- I guess it's a YouTube show? Radio</p> <p>14 show?</p> <p>15 A. It's both.</p> <p>16 Q. Okay. So the fact that your company has</p> <p>17 a YouTube show or radio show or both, it</p> <p>18 doesn't mean everyone that works there is</p> <p>19 exempt, correct?</p> <p>20 A. Exempt?</p> <p>21 Q. Exempt? Is that the correct word? I</p> <p>22 forgot how long it is. Essential. Excuse me.</p> <p>23 A. No, not everybody is essential, that's</p> <p>24 correct.</p> <p>25 Q. Okay. And I'm asking you where the line</p>

<p style="text-align: right;">Page 154</p> <p>1 is drawn as to when someone is essential there</p> <p>2 and when someone is not.</p> <p>3 A. Asked/answered earlier. I don't have the</p> <p>4 number, but the essential workers are the ones</p> <p>5 needed to broadcast the radio show, the YouTube</p> <p>6 channel, XM; those were the essential workers.</p> <p>7 Q. Right. But the -- like, for example, HR,</p> <p>8 I mean, you might be needed there at Lampo, but</p> <p>9 they weren't considered essential?</p> <p>10 A. That's correct. Nor were salespeople,</p> <p>11 for example.</p> <p>12 Q. Okay. That's what I'm saying. How</p> <p>13 closely related to the TV show was an employee</p> <p>14 to be considered essential?</p> <p>15 A. It would have to be pretty closely</p> <p>16 related.</p> <p>17 Q. Like a video editor?</p> <p>18 A. Correct.</p> <p>19 Q. And did you consider at all the</p> <p>20 individual job duties of these folks, or did</p> <p>21 you just say, hey, we can get away with this,</p> <p>22 and we'll -- we'll have them come in the</p> <p>23 office?</p> <p>24 MS. SANDERS: Objection to the form.</p> <p>25 THE WITNESS: We considered the</p>	<p style="text-align: right;">Page 156</p> <p>1 that's protected by the work product doctrine.</p> <p>2 BY MR. STREET:</p> <p>3 Q. Did you preserve documents?</p> <p>4 A. We were all instructed to preserve</p> <p>5 documents, yes.</p> <p>6 Q. Okay. What documents did you preserve?</p> <p>7 A. Anything and any -- everything related to</p> <p>8 Brad Amos.</p> <p>9 Q. Okay. And from what date did you</p> <p>10 preserve these documents?</p> <p>11 A. I don't have that in front of me, but it</p> <p>12 was for the entire employment period, so from</p> <p>13 the time that he first applied for the position</p> <p>14 through the -- past the date of termination.</p> <p>15 Q. Okay. Did employees at Lampo express</p> <p>16 concern with Lampo's response to the COVID-19</p> <p>17 pandemic?</p> <p>18 A. Some did.</p> <p>19 Q. Who were those folks?</p> <p>20 A. There's a whole series of people.</p> <p>21 Q. A lot?</p> <p>22 A. I wouldn't say a lot, but there were</p> <p>23 people express concern. There were a lot of</p> <p>24 things that were unknown when COVID hit.</p> <p>25 Q. Right. But I'm asking you who actually</p>
<p style="text-align: right;">Page 155</p> <p>1 individual job duties.</p> <p>2 BY MR. STREET:</p> <p>3 Q. Okay. Since Mr. Amos left, what</p> <p>4 specifically have you done to investigate any</p> <p>5 of his claims in this lawsuit?</p> <p>6 MS. SANDERS: Objection, work</p> <p>7 product.</p> <p>8 THE WITNESS: We were instructed by</p> <p>9 our counsel --</p> <p>10 MS. SANDERS: And you don't have to</p> <p>11 answer what you were instructed to do by your</p> <p>12 counsel.</p> <p>13 THE WITNESS: Right.</p> <p>14 BY MR. STREET:</p> <p>15 Q. But what did you do?</p> <p>16 MS. SANDERS: Objection.</p> <p>17 THE WITNESS: Whatever -- whatever</p> <p>18 was instructed by our counsel.</p> <p>19 BY MR. STREET:</p> <p>20 Q. Well, what did you do?</p> <p>21 MS. SANDERS: Objection. That's</p> <p>22 protected by attorney- --</p> <p>23 MR. STREET: I'm not asking him what</p> <p>24 anyone said; I'm asking what he did.</p> <p>25 MS. SANDERS: I directed it, so</p>	<p style="text-align: right;">Page 157</p> <p>1 expressed concern.</p> <p>2 A. There was a whole series of people. It</p> <p>3 wasn't one person. I had --</p> <p>4 Q. I'm asking --</p> <p>5 A. I had people on my team that expressed</p> <p>6 concern to me.</p> <p>7 Q. Okay. And were they concerned about</p> <p>8 Lampo's response or just to COVID itself?</p> <p>9 A. COVID itself.</p> <p>10 Q. All right. I'm asking you who was</p> <p>11 concerned about Lampo's response to COVID.</p> <p>12 A. I don't know any particular names. I can</p> <p>13 think of several people who either were</p> <p>14 concerned about how -- what we were doing or</p> <p>15 not doing, concerned about returning to the</p> <p>16 office, concerned about anything related to</p> <p>17 COVID. There was a lot of fear during that</p> <p>18 time, so there were a lot of people that were</p> <p>19 expressing concerns with -- the only</p> <p>20 appropriate response would have been you don't</p> <p>21 have to come to work basically.</p> <p>22 Q. Okay. And was that your response to</p> <p>23 several employees, did they -- when they</p> <p>24 expressed concern, you don't have to come in?</p> <p>25 A. No. We made exceptions for people for</p>

<p style="text-align: right;">Page 158</p> <p>1 periods of time, so we did make a lot of</p> <p>2 exceptions to people depending on their</p> <p>3 personal situation, what was going on at home,</p> <p>4 their health or immediate family's help. So</p> <p>5 there were a lot of exceptions made during that</p> <p>6 time.</p> <p>7 Q. Were there records kept of these</p> <p>8 individuals that were -- that you would excuse</p> <p>9 from coming into the office?</p> <p>10 A. There was so much going on at the</p> <p>11 beginning of this that, no, there were no</p> <p>12 records kept at the very beginning of this when</p> <p>13 all these exceptions were taking place.</p> <p>14 Q. Okay. Did you lay anyone off as a result</p> <p>15 of COVID-19?</p> <p>16 A. We didn't lay anyone off. There were</p> <p>17 some people that resigned of their own</p> <p>18 volition. There were people that -- a lot of</p> <p>19 people that moved back home. We relocated</p> <p>20 about 50 percent of our team members. So there</p> <p>21 were some people who decided they wanted to</p> <p>22 move back and be closer to family.</p> <p>23 Q. There were people that resigned as a</p> <p>24 result of -- of COVID?</p> <p>25 A. As a result of wanting to be closer to</p>	<p style="text-align: right;">Page 160</p> <p>1 with benefits, it would be too hard to say you</p> <p>2 can only speak to someone on this date.</p> <p>3 Q. I see. But she couldn't perform her job</p> <p>4 at home?</p> <p>5 A. She could not.</p> <p>6 Q. Okay. What was it about her job that</p> <p>7 made had essential?</p> <p>8 A. She wasn't essential.</p> <p>9 MS. SANDERS: Object to form.</p> <p>10 BY MR. STREET:</p> <p>11 Q. I'm sorry. What did you say?</p> <p>12 A. She wasn't essential. She wasn't there</p> <p>13 when we closed down the office. This was after</p> <p>14 we decided to return to work.</p> <p>15 Q. Okay. So Karla Lundell is one who</p> <p>16 complained. What am I -- I want to make sure</p> <p>17 you understand what I'm asking you. I'm asking</p> <p>18 you about any employee who complained about</p> <p>19 Lampo's response to COVID-19. And does that</p> <p>20 include Ms. Lundell?</p> <p>21 A. Yeah. I don't know if --</p> <p>22 Q. So that's one person?</p> <p>23 A. Yeah. And there's nobody else that comes</p> <p>24 to mind per se. There were people that had</p> <p>25 suggestions, and Karla would be more in the,</p>
<p style="text-align: right;">Page 159</p> <p>1 family.</p> <p>2 Q. Who were those people?</p> <p>3 A. I don't have any particular names to give</p> <p>4 you.</p> <p>5 Q. Are you aware of anyone -- other employee</p> <p>6 at Lampo complaining about their response to</p> <p>7 COVID-19?</p> <p>8 A. Complaining about Lampo's response?</p> <p>9 Q. Yes.</p> <p>10 A. I'm aware of several, yes.</p> <p>11 Q. Who were they?</p> <p>12 A. So one that comes to mind is someone that</p> <p>13 worked on my team, and that's Karla Lundell.</p> <p>14 Q. Okay. Is she still with the company?</p> <p>15 A. She is not. She moved to Wisconsin.</p> <p>16 Q. What was her concern with the response?</p> <p>17 A. Her concern was trying to alter or</p> <p>18 stagger days so that everybody wasn't in the</p> <p>19 office at the same time.</p> <p>20 Q. She -- that was her suggestion?</p> <p>21 A. That was her suggestion, yes.</p> <p>22 Q. And you said you can't do that?</p> <p>23 A. Correct.</p> <p>24 Q. Was there a reason you couldn't do that?</p> <p>25 A. The role that she held and what she did</p>	<p style="text-align: right;">Page 161</p> <p>1 hey, I'm suggesting this --</p> <p>2 Q. Right.</p> <p>3 A. -- more than I'm complaining about what</p> <p>4 we're doing.</p> <p>5 Q. I'm asking you -- I thought I</p> <p>6 misunderstood you because when I asked you that</p> <p>7 a minute ago, you said there several, and now</p> <p>8 you're saying there's just one?</p> <p>9 A. Yeah, because most of them were</p> <p>10 suggestions, not I'm complaining.</p> <p>11 Q. Yeah, let me explain my question. Then</p> <p>12 what about -- what employees offered</p> <p>13 suggestions?</p> <p>14 A. Karla would have been one.</p> <p>15 Q. Okay. Who else?</p> <p>16 A. I don't have a list off the top of my</p> <p>17 head.</p> <p>18 Q. Do you know how many there were?</p> <p>19 A. I'm going to say there were a handful</p> <p>20 five, six; there wasn't 20.</p> <p>21 Q. Okay. And if they did -- if employees</p> <p>22 did have complaints about Lampo's response to</p> <p>23 COVID, where would they direct those</p> <p>24 complaints?</p> <p>25 A. They were -- they were told to come speak</p>

<p style="text-align: right;">Page 162</p> <p>1 with me, speak to HR.</p> <p>2 Q. Okay. And it's your testimony that there</p> <p>3 was only five or six people that complained</p> <p>4 about Ramsey's -- or excuse me -- COVID's</p> <p>5 response total in the whole company?</p> <p>6 A. Yeah. And I didn't -- and I didn't use</p> <p>7 the word "complaint." So there were people who</p> <p>8 had suggestions and said "Hey" --</p> <p>9 Q. Sure.</p> <p>10 A. -- "why can't we do this?" Or "Have we</p> <p>11 thought about doing that?"</p> <p>12 Q. Fair enough.</p> <p>13 So you're saying there's five or six</p> <p>14 people who had suggestions and/or complaints?</p> <p>15 A. Yes. The people that would have</p> <p>16 complained, to use your word, many of them we</p> <p>17 didn't -- they didn't speak with their mouth,</p> <p>18 they spoke with their feet. They resigned.</p> <p>19 They went somewhere else.</p> <p>20 Q. No one ever complained about the specific</p> <p>21 manner in which Lampo responded to the</p> <p>22 pandemic?</p> <p>23 A. To me directly in saying I disagree with</p> <p>24 this?</p> <p>25 Q. I'm saying did anyone complain -- you're</p>	<p style="text-align: right;">Page 164</p> <p>1 suggestions or complained or complaints about</p> <p>2 Lampo's response, what would you do as -- as a</p> <p>3 result? Would you follow up on them? Would</p> <p>4 you take them into consideration?</p> <p>5 A. Yeah --</p> <p>6 Q. Okay.</p> <p>7 A. -- both.</p> <p>8 Q. Did you change any policy -- or did Lampo</p> <p>9 change any policy based on any kind of</p> <p>10 suggestion or complaint from an employee?</p> <p>11 A. We did.</p> <p>12 Q. What was that?</p> <p>13 A. So, for example, we added soap stations</p> <p>14 to every kitchen sink with antibacterial soap.</p> <p>15 We moved to doing video meetings for a period</p> <p>16 of time so our staff meetings were held with</p> <p>17 video.</p> <p>18 Q. How long did that go on?</p> <p>19 A. I'm going to guess probably five,</p> <p>20 six weeks.</p> <p>21 Q. Total?</p> <p>22 A. Total time, yes, from the time we started</p> <p>23 it to the time we ended it.</p> <p>24 Q. And then you went back to in-person?</p> <p>25 A. And then we went back to voluntary</p>
<p style="text-align: right;">Page 163</p> <p>1 here on behalf of the company today. Did</p> <p>2 anyone complain to the company about Lampo's</p> <p>3 response to COVID?</p> <p>4 A. Yeah. There was a lot of suggestions.</p> <p>5 There was a lot of unknowns. This is a crazy</p> <p>6 time, unprecedented time in the country's</p> <p>7 history. There were a lot of things going on,</p> <p>8 so there were a lot of people voicing concern,</p> <p>9 a lot of people voicing suggestions. There was</p> <p>10 not someone that specifically said, "Hey, I --</p> <p>11 that one thing right there, I disagree with."</p> <p>12 Q. All right. I'm just asking, you're</p> <p>13 saying all these -- there was a lot of people</p> <p>14 making suggestions, but as you've sat here</p> <p>15 today, you've only been able to tell me one</p> <p>16 person, and that's Karla Lundell.</p> <p>17 A. That's right, because she was on my team.</p> <p>18 I do not recall -- you may have -- I'm sure</p> <p>19 you're aware of what was going on during that</p> <p>20 period of time. The world was crazy. For me</p> <p>21 to sit here and go, oh, yeah, it was So-and-So</p> <p>22 and So-and-So -- there's no one else that</p> <p>23 stands out in my head. The only reason Karla</p> <p>24 stands out is because she was on my team.</p> <p>25 Q. Okay. So when these folks would make</p>	<p style="text-align: right;">Page 165</p> <p>1 in-person and then eventually to where that</p> <p>2 became part of the work.</p> <p>3 Q. Okay. How long was it voluntary</p> <p>4 in-person?</p> <p>5 A. Probably another couple of weeks after</p> <p>6 that.</p> <p>7 Q. Okay. And then Lampo at times has</p> <p>8 all-employee meetings, do they not?</p> <p>9 A. We do.</p> <p>10 Q. How often do they have those?</p> <p>11 A. We do a staff meeting every Monday</p> <p>12 morning, and we do a secondary, we call them</p> <p>13 devotional, on Wednesdays.</p> <p>14 Q. Okay. And that's -- all employees attend</p> <p>15 both those events?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. How long did Lampo suspend those</p> <p>18 events after COVID? I think -- and I don't</p> <p>19 want to put words in your mouth, but I want to</p> <p>20 understand, you said five or six weeks?</p> <p>21 A. So we were five to six weeks work from</p> <p>22 home. So those meetings were suspended for</p> <p>23 that period of time. Then there was an</p> <p>24 additional period of time where it was</p> <p>25 voluntary, and that was probably three to</p>

<p style="text-align: right;">Page 166</p> <p>1 four weeks, and then we went back to in-person.</p> <p>2 Q. Okay. So five or six weeks at home,</p> <p>3 three to four weeks was video, and then it was</p> <p>4 required for people to be back there again?</p> <p>5 A. Correct.</p> <p>6 Q. And this was for Monday staff meetings</p> <p>7 and Wednesday you call it devotional?</p> <p>8 A. Correct.</p> <p>9 Q. What is a devotional?</p> <p>10 A. We bring in different speakers from, you</p> <p>11 know, around the country or around the area.</p> <p>12 So during that time, like, we had people like</p> <p>13 Henry Cloud.</p> <p>14 Q. Who is Henry Cloud?</p> <p>15 A. Henry Cloud is known psychologist, wrote</p> <p>16 different books, Boundaries being one of the</p> <p>17 more famous ones. He was one that came in and</p> <p>18 spoke to the team. They're meant to motivate</p> <p>19 the team, uplift the team, and teach the team.</p> <p>20 Q. All right. And I ask that because the</p> <p>21 word "devotional" at times has a religious</p> <p>22 context to it.</p> <p>23 A. It does.</p> <p>24 Q. Were they religious meetings at all?</p> <p>25 A. There -- some of them are pastors. So</p>	<p style="text-align: right;">Page 168</p> <p>1 they speak. But to my knowledge, no. He's one</p> <p>2 that I know because he's stated it.</p> <p>3 Q. Any leaders from the Buddhist church in</p> <p>4 town?</p> <p>5 MS. SANDERS: Just so I don't have to</p> <p>6 keep objecting -- objecting, these questions</p> <p>7 are outside the scope, but, of course, he can</p> <p>8 answer.</p> <p>9 THE WITNESS: No, not to my</p> <p>10 knowledge.</p> <p>11 BY MR. STREET:</p> <p>12 Q. Any other religion representing these</p> <p>13 85 pastors besides Christianity except this</p> <p>14 one, Rabbi Lapin?</p> <p>15 A. I'm sure there were others. Again, I --</p> <p>16 we never ask someone, "Hey, what denomination</p> <p>17 are you? What -- what's your religious</p> <p>18 background before you speak to the team?" So</p> <p>19 we don't ask that question.</p> <p>20 Q. Do they not introduce themselves or what</p> <p>21 church they were with?</p> <p>22 A. Not always. Not everybody is with a</p> <p>23 church. Again, Henry Cloud is not with a</p> <p>24 church; Christine King is not with a church.</p> <p>25 Q. The 85 percent you said were pastors,</p>
<p style="text-align: right;">Page 167</p> <p>1 about 85 percent of the people that speak are</p> <p>2 pastors from either local or national churches,</p> <p>3 and the other 15 percent are motivational</p> <p>4 speakers.</p> <p>5 Q. Okay. These 85 percent that are pastors,</p> <p>6 did you -- are you aware of any imam that came</p> <p>7 in and spoke?</p> <p>8 MS. SANDERS: Objection, because it's</p> <p>9 outside the scope.</p> <p>10 BY MR. STREET:</p> <p>11 Q. You can answer.</p> <p>12 A. Yeah, I'm not.</p> <p>13 Q. Are you aware of any Jewish religious</p> <p>14 leader? I don't know what you call it.</p> <p>15 A. I am.</p> <p>16 Q. Okay. Who was that?</p> <p>17 A. Lapin, Rabbi Lapin.</p> <p>18 Q. Rabbi Lapin. Rabbi. Thank you.</p> <p>19 Rabbi Lapin?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Were there any others?</p> <p>22 A. Any other Jewish?</p> <p>23 Q. Yes.</p> <p>24 A. So it's hard to answer that question</p> <p>25 because I don't ask them what they are before</p>	<p style="text-align: right;">Page 169</p> <p>1 they're with a church; fair to say?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Them saying -- the 85 percent of</p> <p>4 the speakers, did they not identify, say, "Hey</p> <p>5 we're with such-and-such church" before they</p> <p>6 spoke?</p> <p>7 A. Yeah. But some of the churches have</p> <p>8 different meanings. Like, it doesn't say what</p> <p>9 denomination it is.</p> <p>10 Q. Right.</p> <p>11 A. "I'm with Three Rivers Church," I don't</p> <p>12 know what denomination that would be.</p> <p>13 Q. Right. And I'm not asking about</p> <p>14 particular denominations, more so, you know,</p> <p>15 whether it be Methodist, Presbyterians,</p> <p>16 Catholics, and then your Christian leaders</p> <p>17 other than Jewish, Muslim, Buddhist.</p> <p>18 A. Correct.</p> <p>19 Q. Do you see the distinction I'm making?</p> <p>20 A. I see the distinction. The point I'm</p> <p>21 making is a Buddhist or a Jewish or other areas</p> <p>22 that you are speaking of would still come in</p> <p>23 and say, "I'm with Three Rivers." They don't</p> <p>24 say, "I'm with Three Rivers Buddhist Church."</p> <p>25 Q. All right. But as far as you just told</p>

<p style="text-align: right;">Page 170</p> <p>1 me, there was only one Jewish --</p> <p>2 A. One that I'm aware of.</p> <p>3 Q. One that you're aware.</p> <p>4 How long you been there?</p> <p>5 A. Because -- because he stated it.</p> <p>6 Eight years.</p> <p>7 Q. Okay. Are you aware at all about any</p> <p>8 communications that Mr. Amos had with anyone at</p> <p>9 Lampo regarding his concerns regarding Lampo's</p> <p>10 COVID-19 response?</p> <p>11 A. I am not.</p> <p>12 Q. Are you aware of any accommodation he</p> <p>13 requested during his employment there?</p> <p>14 A. No. He would have been directed to -- to</p> <p>15 me, and I'm not aware.</p> <p>16 Q. Okay. So if he had asked to work from</p> <p>17 home, that would have gone to you?</p> <p>18 A. Correct.</p> <p>19 Q. And you don't think you ever saw</p> <p>20 Mr. Amos -- you're saying Mr. Amos never</p> <p>21 considered to work from home?</p> <p>22 A. That is correct. That's what I'm saying.</p> <p>23 Q. Okay. Before termination of Mr. Amos,</p> <p>24 did Lampo issue any corrective action toward</p> <p>25 him for any reason?</p>	<p style="text-align: right;">Page 172</p> <p>1 stack"?</p> <p>2 THE WITNESS: Exhibit 4.</p> <p>3 BY MR. STREET:</p> <p>4 Q. So if you do -- if it exists, you have</p> <p>5 given it to us in discovery?</p> <p>6 A. That's correct.</p> <p>7 Q. Okay. And if it doesn't in discovery,</p> <p>8 we'll just assume it doesn't exist; is that</p> <p>9 fair to say?</p> <p>10 A. Fair to say.</p> <p>11 Q. Okay. We touched briefly on this, but I</p> <p>12 want to talk more about it. Did I hear you</p> <p>13 say -- and, again, correct me if I'm wrong, I'm</p> <p>14 not putting words in your mouth -- but did you</p> <p>15 say Lampo doesn't have a discipline or</p> <p>16 corrective action policy?</p> <p>17 A. We do not.</p> <p>18 Q. Okay. So how is discipline or corrective</p> <p>19 action handled at Lampo if there is no policy?</p> <p>20 A. The leaders would handle it with the team</p> <p>21 member, and before it would rise to the level</p> <p>22 of termination, it would come into</p> <p>23 HR Committee.</p> <p>24 Q. Okay. So the HR Committee was the</p> <p>25 policy?</p>
<p style="text-align: right;">Page 171</p> <p>1 A. The e-mail from Mr. DiCicco would have</p> <p>2 been deemed as corrective action.</p> <p>3 Q. Okay. And let's look through -- which</p> <p>4 one are you talking about there?</p> <p>5 A. So the e-mail dated Tuesday, April 7th,</p> <p>6 2020, where he is having the communication with</p> <p>7 Luke LeFevre saying this is what I want to</p> <p>8 communicate with Brad.</p> <p>9 Q. Which one again? Let me see.</p> <p>10 A. Oh, I see.</p> <p>11 Q. Okay. This e-mail that you're -- that we</p> <p>12 have a copy of him -- Mr. DiCicco sent to Luke</p> <p>13 LeFevre --</p> <p>14 A. Yeah.</p> <p>15 Q. -- and it said, "This is what you should</p> <p>16 say to" --</p> <p>17 A. "This is what I would like to say."</p> <p>18 Q. Okay. But correct me if I'm wrong, do we</p> <p>19 have a copy of the actual e-mail sent to Brad</p> <p>20 with this in it?</p> <p>21 A. I believe we do, but I have not seen that</p> <p>22 in this stack of documents.</p> <p>23 Q. Okay.</p> <p>24 MS. SANDERS: For the record,</p> <p>25 Exhibit 4, is that what you mean by "this</p>	<p style="text-align: right;">Page 173</p> <p>1 A. Governing body, yes.</p> <p>2 Q. Okay.</p> <p>3 MS. IRWIN: Can we take a ten-minute</p> <p>4 break, restroom break?</p> <p>5 MR. STREET: Sure.</p> <p>6 Ten-minute restroom break.</p> <p>7 THE VIDEOGRAPHER: We are going off</p> <p>8 the record. The time on the monitor is</p> <p>9 2:54 p.m.</p> <p>10 (Short break.)</p> <p>11 THE VIDEOGRAPHER: We are back on the</p> <p>12 record. The time on the monitor is 3:03 p.m.</p> <p>13 BY MR. STREET:</p> <p>14 Q. Now, was anyone from Lampo terminated for</p> <p>15 refusing to come back in the office during</p> <p>16 COVID?</p> <p>17 A. Yes.</p> <p>18 Q. Who?</p> <p>19 A. I don't have the names specifically.</p> <p>20 Q. How many people?</p> <p>21 A. I'd say probably between six and ten,</p> <p>22 somewhere in that neighborhood.</p> <p>23 When you say "terminated," it was a</p> <p>24 separation.</p> <p>25 Q. You say it was a separation. What's the</p>

<p style="text-align: right;">Page 174</p> <p>1 difference between that and a termination?</p> <p>2 A. I guess in this instance, there wouldn't</p> <p>3 be one.</p> <p>4 Q. Do you remember what the specific</p> <p>5 complaints they had about coming in the office</p> <p>6 were?</p> <p>7 A. There weren't complaints. It was -- it</p> <p>8 was health reasons. So the -- trying to think</p> <p>9 of a particular person to be able to give you a</p> <p>10 specific on that.</p> <p>11 Q. You're not saying you fired them for</p> <p>12 health reasons?</p> <p>13 A. No. They -- so the person that I'm</p> <p>14 thinking about was single, living alone, was</p> <p>15 perfectly healthy but felt that COVID was so</p> <p>16 scary to her, she couldn't bring herself to</p> <p>17 come back into work, even given the</p> <p>18 accommodation of do you want to be on a</p> <p>19 different floor, do you want to have a desk</p> <p>20 that's more than 6 feet away from anyone. She</p> <p>21 just could not pass her anxiety of being able</p> <p>22 to come in and perform her job.</p> <p>23 Q. And that's one person of the six to ten</p> <p>24 you remember?</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 176</p> <p>1 Q. I see.</p> <p>2 When did Ramsey make the determination to</p> <p>3 bring everyone back into the office?</p> <p>4 A. It was -- it was five weeks. There was</p> <p>5 five weeks where we made the determination to</p> <p>6 come back in after not being in the office, and</p> <p>7 then we had that two week where -- voluntary</p> <p>8 where you can come in or not come in, your</p> <p>9 call, and then we moved to if you need an</p> <p>10 accommodation, you must go see HR to get an</p> <p>11 accommodation.</p> <p>12 Q. All right. And how many accommodations</p> <p>13 did you issue during this time period?</p> <p>14 A. We issued quite a few. In fact, at</p> <p>15 first, there was a very easy accommodation, and</p> <p>16 then as we -- we -- we're not a work-from-home</p> <p>17 workplace. So as we started saying, "Hey, we</p> <p>18 are not a work-from-home workplace. We believe</p> <p>19 that the best work is done when you're here and</p> <p>20 you're able to collaborate and see people in</p> <p>21 the hallway," as we moved further -- further</p> <p>22 away from -- from that, we began to rein in the</p> <p>23 accommodations.</p> <p>24 Q. Okay. Who made the determination that</p> <p>25 you wouldn't be a work-from-home workplace?</p>
<p style="text-align: right;">Page 175</p> <p>1 I can think of other people who basically</p> <p>2 said, "Hey, I'm moving." I can think of one</p> <p>3 lady who said her -- she was going to visit her</p> <p>4 mom, she couldn't put herself to be in the</p> <p>5 office and go visit her mom and didn't know how</p> <p>6 frequently she was going to go visit her mom.</p> <p>7 She wanted to keep that option open and coming</p> <p>8 into the office every day felt like was going</p> <p>9 to expose her mom to COVID.</p> <p>10 Q. What was her job?</p> <p>11 A. She was on the personalities team.</p> <p>12 Q. What is that?</p> <p>13 A. That is the -- earlier, we were speaking</p> <p>14 about George Kamel and Anthony O'Neill and some</p> <p>15 of these different people that have shows,</p> <p>16 radio shows or YouTube shows. So they are</p> <p>17 the -- the face of Ramsey, if you will.</p> <p>18 They're out there speaker -- public speakers.</p> <p>19 Q. Who was this person on the personality</p> <p>20 team?</p> <p>21 A. I don't remember her name. I'd have to</p> <p>22 go back and look for it.</p> <p>23 Q. Did she have her own show?</p> <p>24 A. No. This is not a personality. She</p> <p>25 worked on the personalities team.</p>	<p style="text-align: right;">Page 177</p> <p>1 A. That would have been leadership back when</p> <p>2 the company was first started.</p> <p>3 Q. Okay. Was there -- was there a written</p> <p>4 policy about that?</p> <p>5 A. I don't know that there's a written</p> <p>6 policy, but I know that's even how we even</p> <p>7 advertise our jobs. It's part of what every</p> <p>8 recruiter speaks to people about. We're a</p> <p>9 work-from-work place. So we don't hire</p> <p>10 developers, for example, it's a hard position</p> <p>11 to hire, and we don't do remote workers.</p> <p>12 Q. Okay. But there's nothing in writing</p> <p>13 that says that?</p> <p>14 A. To my knowledge, no, but it is our</p> <p>15 practice. While it may not be in writing, it</p> <p>16 is what we do.</p> <p>17 Q. Okay. So I'm not sure I understand</p> <p>18 because we are talking about defendant's</p> <p>19 response. At some point, Lampo thought it was</p> <p>20 more important to have people in the office</p> <p>21 than maybe follow every COVID guideline; is</p> <p>22 that fair to say?</p> <p>23 A. That's not fair to say because we were</p> <p>24 following the CDC guidelines.</p> <p>25 Q. Okay.</p>

<p style="text-align: right;">Page 178</p> <p>1 A. And at that point, we put those 2 precautions in place and followed everything, 3 whether it was the CDC or the State of 4 Tennessee guideline. That's not a 5 recommendation, not a best practice, but a 6 guideline that said you must do this. We 7 followed them. 8 Q. Right. And I'm saying it's a guideline. 9 And then you said it yourself, it's not a 10 requirement. And I'm saying did -- did Ramsey 11 look at it that way, this is just a guideline 12 or it's a suggestion rather than a rule? 13 A. We looked at things that were suggestions 14 as suggestions. We looked at things that were 15 either the law or mandate as a mandate or a 16 law. 17 I'm not sure if that answers your 18 question. 19 Q. Sort of. 20 You're saying if it was possible to have 21 some -- have these folks back in the office, 22 you were going to do what it took to get them 23 back in the office? 24 A. Yes. We were going to be a 25 work-from-work place. So where -- where it was</p>	<p style="text-align: right;">Page 180</p> <p>1 of the company. 2 Q. Okay. Does he -- these policies -- these 3 unwritten policies, like the one we just talked 4 about, are these from Mr. Ramsey himself? 5 A. No. 6 Q. If there's nothing in writing that says 7 we are a work-from-work place, I think that was 8 your term you used, work-from-work -- 9 A. Yes. So there's no policy, right. So, 10 yes, we haven't written down our recruiters say 11 it to every candidate. 12 Q. Where is it -- okay. That's fine. 13 Where is it written down? 14 A. So it would be written down in HR Zoom 15 Screen interviews, for example, to -- to make 16 sure you let people know that we're not a 17 remote workplace. It's written in our ad copy 18 when we post jobs. It's written in our website 19 when people apply for a position to say that 20 we're not a -- we're not a remote workplace. 21 We are a work from workplace. 22 Q. And it said this even prior to COVID? 23 A. Yes. 24 Q. Okay. So the website -- 25 A. Yes.</p>
<p style="text-align: right;">Page 179</p> <p>1 allowed by the state law or where it was 2 allowed by CDC, we were going to move in that 3 direction. 4 Q. Are you familiar with any kind of policy 5 at Lampo regarding fear of the virus is not 6 going to be tolerated, something along those 7 lines? 8 A. We don't have any such policy that I'm 9 aware of. 10 Q. Okay. Are you aware if Mr. Ramsey said 11 that on his TV -- on his, excuse me, his 12 YouTube show? 13 A. I don't listen to every one of them, so, 14 no, I'm not aware of that. 15 Q. Okay. What's Mr. Ramsey's role in the 16 day-to-day operations of the company? 17 MS. SANDERS: Objection, outside the 18 scope. He can answer. 19 THE WITNESS: By Mr. Ramsey, I'm 20 assuming you mean Dave Ramsey, right? 21 BY MR. STREET: 22 Q. Yes. 23 A. Okay. Thank you. 24 So he is the CEO. He is also a 25 personality, a speaker, so he speaks on behalf</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. -- said that prior to COVID? 2 A. Yes. 3 Q. And you said you had ad copy for jobs 4 that said this specifically? 5 A. Yes. 6 Q. Where would those ad copy be provided to? 7 A. So wherever we advertised for jobs, which 8 is really everywhere. And I don't -- 9 Q. Right. But this is specifically where? 10 A. So LinkedIn is an example. 11 Q. Okay. Where else? 12 A. So we use an aggregator, and so to -- 13 earlier we talked about Jobvite, which is how 14 Mr. Amos applied. It's an applicant tracking 15 software. That software also pushes our ads to 16 150 different job boards across the United 17 States in every one of those. 18 Q. Okay. It's the same ad copy in -- as 19 would appear in LinkedIn or Indeed or something 20 like that would be the same on everything? 21 A. It pushes it to all of them; that's 22 correct. 23 Q. And you're saying that the job 24 advertisements all say in them, "We're a work 25 from work --</p>

<p style="text-align: right;">Page 182</p> <p>1 A. Not every job advertisement. Like I</p> <p>2 said, it's not a policy, but where we know, for</p> <p>3 example, developers are very accustomed to</p> <p>4 working from home, we would make sure that</p> <p>5 those ads would say work from work because we</p> <p>6 want to make -- we don't want to their waste</p> <p>7 time or our time applying for a position.</p> <p>8 Q. So this ad copy that you're talking about</p> <p>9 would say this would just be for developers?</p> <p>10 A. Not necessarily. Again, I'm using that</p> <p>11 as an example because that is a position that</p> <p>12 is known for work -- remote work. But we -- we</p> <p>13 post it on other jobs as well.</p> <p>14 Q. Like what other jobs?</p> <p>15 A. Like any other jobs. Like creative jobs,</p> <p>16 like design jobs, marketing jobs. It is also a</p> <p>17 question that recruiters ask every candidate</p> <p>18 regardless of a job. So it doesn't matter if</p> <p>19 the posting had it or didn't have it. As part</p> <p>20 of the HR screen, they make sure that the</p> <p>21 person on the other end understands that this</p> <p>22 job is in Franklin, Tennessee.</p> <p>23 Q. And there will be a script that these</p> <p>24 folks read?</p> <p>25 A. No, there wasn't a script at that time.</p>	<p style="text-align: right;">Page 184</p> <p>1 pages?</p> <p>2 A. It's a whole combination of things, and I</p> <p>3 believe that was part of the discovery turned</p> <p>4 in. So policies and procedures are, for</p> <p>5 example, we're a non-smoking campus, so that</p> <p>6 would be on there; EEO policy would be on</p> <p>7 there.</p> <p>8 Q. Okay. Is there something called a "Good</p> <p>9 Living Policy" or something like that?</p> <p>10 A. No, not to my knowledge.</p> <p>11 Q. Okay. And I'm probably using the -- the</p> <p>12 name wrong.</p> <p>13 A. I can't think of something that's "Good</p> <p>14 Living."</p> <p>15 Q. What was Ms. O'Connor fired for? What</p> <p>16 violation was she fired for?</p> <p>17 MS. SANDERS: Objection.</p> <p>18 BY MR. STREET:</p> <p>19 Q. You can answer.</p> <p>20 MS. SANDERS: You can answer.</p> <p>21 THE WITNESS: Okay. Now I get what</p> <p>22 you're saying. It's Righteous Living.</p> <p>23 BY MR. STREET:</p> <p>24 Q. Righteous Living. Righteous Living.</p> <p>25 Okay.</p>
<p style="text-align: right;">Page 183</p> <p>1 There is one now, but there was not one there.</p> <p>2 It's just part of the training that we train</p> <p>3 every recruiter on.</p> <p>4 Q. And you trained the recruiters in HR when</p> <p>5 they're interviewing to tell everyone?</p> <p>6 A. That's correct. Because it leads to a</p> <p>7 lot of people -- you end up spending a lot of</p> <p>8 their time and our time, and then it doesn't</p> <p>9 work out.</p> <p>10 Q. Okay. So there's training materials that</p> <p>11 you have that would say here's what we expect</p> <p>12 you to do and expect you to tell --</p> <p>13 A. So it's -- most of our training is done</p> <p>14 hands-on. So you come on as a recruiter, you</p> <p>15 sit next to another recruiter, and you learn as</p> <p>16 you go.</p> <p>17 Q. So, no, it's not in writing anywhere?</p> <p>18 A. Correct.</p> <p>19 Q. Is there an employee handbook at -- for</p> <p>20 Lampo?</p> <p>21 A. There's eight pages that constitute our</p> <p>22 policies and procedures.</p> <p>23 Q. Okay.</p> <p>24 A. Not an employee handbook, no.</p> <p>25 Q. All right. What are on those eight</p>	<p style="text-align: right;">Page 185</p> <p>1 What's in the Righteous Living Policy?</p> <p>2 A. It just basically says that we are an</p> <p>3 organization that believes that character</p> <p>4 matters, and it matters all the time.</p> <p>5 Q. That's basically -- what specifically</p> <p>6 does it say?</p> <p>7 A. That is specifically what it says.</p> <p>8 Q. Is that -- say that again for me.</p> <p>9 A. Character -- character matters, and it</p> <p>10 matters all the time.</p> <p>11 Q. That's all it says?</p> <p>12 A. Who you are -- who you are here Monday</p> <p>13 through Friday is who you should be on Friday</p> <p>14 night and Saturday night and outside of here.</p> <p>15 So your character and what you do and how do</p> <p>16 you it is representative of you and</p> <p>17 representative of the organization.</p> <p>18 Q. Are there anything -- is it more specific</p> <p>19 than that with any kind of -- in regards to any</p> <p>20 kind of what's allowed, what's not allowed?</p> <p>21 A. There's other interpretations, yes.</p> <p>22 Q. Like what?</p> <p>23 A. So there's, for example, sex outside</p> <p>24 marriage is not allowed.</p> <p>25 Q. Okay. What else?</p>

<p style="text-align: right;">Page 186</p> <p>1 A. Honesty, so telling the truth. Lies are</p> <p>2 not allowed under Righteous Living.</p> <p>3 Q. Okay. What else?</p> <p>4 A. Theft is not allowed under Righteous</p> <p>5 Living.</p> <p>6 Q. Okay. What else?</p> <p>7 A. That's the gist of it.</p> <p>8 Q. So no lying, no stealing, no sex outside</p> <p>9 of marriage?</p> <p>10 A. (Nodding.)</p> <p>11 Q. And that's what's covered by the</p> <p>12 Righteous Living Policy, and that's it?</p> <p>13 A. For the most part, those are the -- those</p> <p>14 are the high-level points, yes.</p> <p>15 Q. Okay. Are those specific things listed</p> <p>16 in the policy itself?</p> <p>17 A. Those are discussed usually in the</p> <p>18 interview process, again in on-boarding, again</p> <p>19 in staff meeting.</p> <p>20 Q. Again, just to be sure, Mr. Amos was not</p> <p>21 terminated for any, I guess, unrighteous</p> <p>22 living?</p> <p>23 A. That's correct.</p> <p>24 Q. He was terminated because he was</p> <p>25 insubordinate in that meeting with Mr. LeFevre?</p>	<p style="text-align: right;">Page 188</p> <p>1 DiCicco where she copied him.</p> <p>2 Q. Okay. So Lara and David were involved</p> <p>3 when it was recommended he should be</p> <p>4 terminated?</p> <p>5 A. With termination, yes.</p> <p>6 Q. Okay. Lara Johnson and David DiCicco.</p> <p>7 A. And then the decision was ultimately made</p> <p>8 by Luke LeFevre.</p> <p>9 Q. Okay. Without telling me what you said,</p> <p>10 were you interviewed with -- by anyone</p> <p>11 regarding Mr. Amos's termination?</p> <p>12 A. Interviewed?</p> <p>13 Q. Yes.</p> <p>14 A. No.</p> <p>15 Q. No one asked you about what led to it, no</p> <p>16 one asked you what -- they asked you -- no one</p> <p>17 even asked you about it?</p> <p>18 A. I was asked about it --</p> <p>19 Q. Okay.</p> <p>20 A. -- as to my knowledge about it.</p> <p>21 Q. When was that?</p> <p>22 MS. SANDERS: Objection. That's</p> <p>23 privileged.</p> <p>24 MR. STREET: No. Hold on.</p> <p>25</p>
<p style="text-align: right;">Page 187</p> <p>1 A. That's correct.</p> <p>2 Q. Were there any performance reviews of</p> <p>3 Mr. Amos prior to his termination?</p> <p>4 A. No. His performance review would have</p> <p>5 been at his annual, and he was not there at</p> <p>6 that time.</p> <p>7 Q. Who would have done that performance</p> <p>8 review?</p> <p>9 A. It would have been Lara Johnson.</p> <p>10 Q. Ms. Johnson is still with the company,</p> <p>11 right? I probably asked you that before.</p> <p>12 A. (Nodding.)</p> <p>13 Q. Yes, she is? Thank you.</p> <p>14 A. That is correct.</p> <p>15 Q. All right. I want to talk to you about</p> <p>16 Topic No. 5. In that one we asked for "The</p> <p>17 identity of all persons making either</p> <p>18 recommendation or decision that plaintiff be</p> <p>19 terminated."</p> <p>20 And if I understood you correctly, the</p> <p>21 only person who made that recommendation or</p> <p>22 decision was Luke LeFevre?</p> <p>23 A. The decision, yes. The recommendation,</p> <p>24 as we read in that e-mail from Lara, would have</p> <p>25 been made by Lara Johnson and then David</p>	<p style="text-align: right;">Page 189</p> <p>1 BY MR. STREET:</p> <p>2 Q. When was that?</p> <p>3 MS. SANDERS: Objection. It's</p> <p>4 privileged.</p> <p>5 BY MR. STREET:</p> <p>6 Q. Who was that?</p> <p>7 A. That would have been our general counsel</p> <p>8 and our outside attorney.</p> <p>9 Q. Okay. With regard to defendant's COVID</p> <p>10 response, did anyone beside Mr. Amos complain</p> <p>11 about Lampo's COVID response?</p> <p>12 MS. SANDERS: Object to the form. He</p> <p>13 can answer.</p> <p>14 THE WITNESS: I'm not aware of a</p> <p>15 complaint by Mr. Amos.</p> <p>16 BY MR. STREET:</p> <p>17 Q. Are you aware did anyone including</p> <p>18 Mr. Amos complain about defendant's COVID</p> <p>19 response, any employee of Lampo?</p> <p>20 A. No.</p> <p>21 MS. SANDERS: Objection, asked and</p> <p>22 answered.</p> <p>23 THE WITNESS: So as stated earlier,</p> <p>24 we had a lot of people making suggestions. We</p> <p>25 didn't have anybody raising a complaint.</p>

<p style="text-align: right;">Page 190</p> <p>1 BY MR. STREET:</p> <p>2 Q. No one -- not one person complained; is</p> <p>3 that what your testimony is?</p> <p>4 A. That is correct.</p> <p>5 Q. Okay. So when you said that six to ten</p> <p>6 people were terminated because they didn't come</p> <p>7 back into the office when Lampo thought it was</p> <p>8 time, they were fine with that? There was no</p> <p>9 complaint from these folks?</p> <p>10 A. They did not raise a complaint. So the</p> <p>11 answer -- so the way those conversations went</p> <p>12 is, "We're ready to have a date for you to</p> <p>13 return to the office, so let's talk about</p> <p>14 putting something in writing, so when is a date</p> <p>15 you can be back." Some people just said, "I</p> <p>16 don't see me ever being able to return."</p> <p>17 Q. Okay. Did all the people say that?</p> <p>18 A. No. Some of them we said -- and some of</p> <p>19 them actually did come back where we said,</p> <p>20 "Hey, on this date, I can return to the</p> <p>21 office." And we said, "Okay. That's a</p> <p>22 reasonable time frame, so on that date, we</p> <p>23 expect you back."</p> <p>24 Some of those ten people I mentioned</p> <p>25 were -- as it got closer to that date, they</p>	<p style="text-align: right;">Page 192</p> <p>1 BY MR. STREET:</p> <p>2 Q. Besides Mr. Amos, what other lawsuits or</p> <p>3 complaints were brought against Lampo from</p> <p>4 current or former employees regarding violation</p> <p>5 of Title 7 in 2019-2020?</p> <p>6 A. That would be -- Caitlin O'Connor would</p> <p>7 be the only one in that time period.</p> <p>8 Q. Okay. And I believe Mr. Amos, wasn't he</p> <p>9 there in the same time period?</p> <p>10 A. Yes, but you had stated besides Mr. Amos.</p> <p>11 Q. You're right, you did -- I did.</p> <p>12 All right. We know with Mr. Amos.</p> <p>13 Ms. O'Connor, what investigation was made as a</p> <p>14 result of Mr. [sic] O'Connor's complaints? You</p> <p>15 can answer.</p> <p>16 MR. STREET: You're -- he's here for</p> <p>17 a deposition.</p> <p>18 MS. SANDERS: You can answer.</p> <p>19 THE WITNESS: Okay.</p> <p>20 MS. SANDERS: But just caution the</p> <p>21 witness don't divulge any attorney-client</p> <p>22 privileged contents of that investigation.</p> <p>23 THE WITNESS: So we did a full and</p> <p>24 thorough investigation of all her claims at our</p> <p>25 attorneys' discretion and followed every lead</p>
<p style="text-align: right;">Page 191</p> <p>1 came forward and said, "I'm not -- I'm not</p> <p>2 comfortable. I thought I would be, but I'm</p> <p>3 not. And I know this means I can't maintain my</p> <p>4 employment with Lampo, and so how do we move</p> <p>5 forward?"</p> <p>6 Q. And it was that congenial --</p> <p>7 A. Yeah.</p> <p>8 Q. -- with everyone?</p> <p>9 Okay. And can you give me the names of</p> <p>10 those people, the six to ten people that you're</p> <p>11 talking about?</p> <p>12 A. I don't have them in front of me, so, no,</p> <p>13 I cannot.</p> <p>14 Q. Could you get them for me and get them to</p> <p>15 us later?</p> <p>16 A. I can.</p> <p>17 MR. STREET: Okay. All right. That</p> <p>18 was a request. I'll also get their last known</p> <p>19 addresses and things like that.</p> <p>20 Also, Leslie, did you guys give us a copy</p> <p>21 of this eight-to-ten-page employee manual?</p> <p>22 MS. SANDERS: Yes. It's in the</p> <p>23 initial disclosures.</p> <p>24 MR. STREET: Okay. Pull that out.</p> <p>25</p>	<p style="text-align: right;">Page 193</p> <p>1 as we were instructed to do so.</p> <p>2 BY MR. STREET:</p> <p>3 Q. Okay. I must have misunderstood. Did</p> <p>4 you do that for Mr. Amos as well?</p> <p>5 A. So we did -- after the fact, we did do</p> <p>6 something similar. Same discretion -- same</p> <p>7 direction of our attorneys.</p> <p>8 Q. Okay. What did you do in one and not the</p> <p>9 other? How are they different?</p> <p>10 A. They're not much different in -- in</p> <p>11 following every lead or uncovering what was --</p> <p>12 what took place.</p> <p>13 Q. Did -- the actual investigation work, did</p> <p>14 the attorneys do that or did people in HR do</p> <p>15 that?</p> <p>16 A. The attorneys instructed HR to do some</p> <p>17 and conducted some on their own.</p> <p>18 Q. Did you write a report?</p> <p>19 A. Wrote summary statements to our</p> <p>20 attorneys.</p> <p>21 Q. Okay. And that was as a result of Mr. --</p> <p>22 investigating Mr. Amos's claim as well?</p> <p>23 A. Which one are you speaking of?</p> <p>24 Q. Mr. Amos's claims.</p> <p>25 A. There were responses, yes, to inquiries</p>

<p style="text-align: right;">Page 194</p> <p>1 made by our attorneys.</p> <p>2 Q. Okay. What people did you speak to in</p> <p>3 performing this investigation?</p> <p>4 MS. SANDERS: Objection, privileged.</p> <p>5 BY MR. STREET:</p> <p>6 Q. What people did you speak to?</p> <p>7 MS. SANDERS: Objection, that's</p> <p>8 privileged.</p> <p>9 MR. STREET: It's not a document I'm</p> <p>10 asking for; it's not what you said to him.</p> <p>11 MS. SANDERS: You're asking him to</p> <p>12 tell you who I told him to speak to.</p> <p>13 MR. STREET: I just asked him who he</p> <p>14 spoke to; I didn't ask him who told him what.</p> <p>15 MS. SANDERS: Okay. Well, so I'll</p> <p>16 instruct the witness you may answer that unless</p> <p>17 I told you who to talk to.</p> <p>18 BY MR. STREET:</p> <p>19 Q. I'm asking you who did you actually go</p> <p>20 speak to.</p> <p>21 A. The people I spoke with were the ones</p> <p>22 instructed to by our attorney.</p> <p>23 Q. Which was who?</p> <p>24 MS. SANDERS: Objection. That's</p> <p>25 asking --</p>	<p style="text-align: right;">Page 196</p> <p>1 MR. STREET: Well, then teach him --</p> <p>2 let him tell me.</p> <p>3 MS. SANDERS: No, absolutely not;</p> <p>4 objection.</p> <p>5 MR. STREET: We'll we're going to</p> <p>6 come back on this one, unfortunately --</p> <p>7 MS. SANDERS: That's fine.</p> <p>8 MR. STREET: -- because this is</p> <p>9 important.</p> <p>10 MS. SANDERS: Yeah. And I've given</p> <p>11 you every single witness. You don't need to</p> <p>12 know who I told him who to speak to to know who</p> <p>13 the witnesses are.</p> <p>14 MR. STREET: I don't care who you</p> <p>15 told him to speak to.</p> <p>16 MS. SANDERS: That's what you're</p> <p>17 asking him.</p> <p>18 MR. STREET: No. I asked him who did</p> <p>19 he speak to. Maybe he took your advice, maybe</p> <p>20 he didn't, but --</p> <p>21 MS. SANDERS: You can ask him --</p> <p>22 MR. STREET: -- regardless, it's who</p> <p>23 he spoke to.</p> <p>24 MS. SANDERS: No, it's privileged.</p> <p>25 MR. STREET: No, it's not, Leslie.</p>
<p style="text-align: right;">Page 195</p> <p>1 MR. STREET: It's not -- it's not --</p> <p>2 MS. SANDERS: That's -- that's my</p> <p>3 investigation.</p> <p>4 MR. STREET: Do you want to come back</p> <p>5 again on this, or can we just find out the name</p> <p>6 of the people?</p> <p>7 MS. SANDERS: That privileged.</p> <p>8 MR. STREET: It's not. The privilege</p> <p>9 is not -- how is it privileged?</p> <p>10 MS. SANDERS: And the entire</p> <p>11 investigation is privileged. I directed him.</p> <p>12 If he tells you who he talked to --</p> <p>13 MR. STREET: Work product is</p> <p>14 documentary. And I'm not asking about any of</p> <p>15 the documents. I'm asking about the names of</p> <p>16 these people he talked to.</p> <p>17 MS. SANDERS: I'm talking about my</p> <p>18 investigation. He helped me with my</p> <p>19 investigation.</p> <p>20 MR. STREET: And you -- you're going</p> <p>21 to hide witnesses by not telling us who they</p> <p>22 are?</p> <p>23 MS. SANDERS: I haven't hidden a</p> <p>24 single witness. You have every single thing</p> <p>25 you asked for.</p>	<p style="text-align: right;">Page 197</p> <p>1 You know it's not.</p> <p>2 MS. SANDERS: I know --</p> <p>3 MR. STREET: I really don't want to</p> <p>4 come back.</p> <p>5 MS. SANDERS: Okay. We'll come back.</p> <p>6 MR. STREET: Good grief.</p> <p>7 MS. SANDERS: That will be fine.</p> <p>8 MR. STREET: Expected.</p> <p>9 BY MR. STREET:</p> <p>10 Q. So you're refusing to answer that</p> <p>11 question, sir?</p> <p>12 MS. SANDERS: I'm instructing him not</p> <p>13 to answer that question.</p> <p>14 BY MR. STREET:</p> <p>15 Q. So your attorney -- on your attorney's</p> <p>16 instructions, you're refusing to answer that</p> <p>17 question?</p> <p>18 A. I'm following my attorney's advice.</p> <p>19 Q. Okay. What documents did you create as a</p> <p>20 result? I'm not asking what they said; I'm</p> <p>21 asking what they were.</p> <p>22 A. Responses to the inquiries by our</p> <p>23 attorneys so that those were the documents</p> <p>24 created. I responded to their questions.</p> <p>25 Q. You responded to the questions from the</p>

<p style="text-align: right;">Page 198</p> <p>1 attorney?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. And they were based on statements</p> <p>4 you took from other folks?</p> <p>5 A. Some, yes.</p> <p>6 Q. Okay. The folks you won't tell me who</p> <p>7 they are; is it those folks?</p> <p>8 A. The folks I was instructed not to tell</p> <p>9 you, yes.</p> <p>10 Q. Okay. So you spoke to these people or</p> <p>11 some people, whoever they might be, and you</p> <p>12 wrote up their statements in response to</p> <p>13 specific questions from your outside counsel</p> <p>14 and in-house counsel?</p> <p>15 A. At this point, it would have been outside</p> <p>16 counsel, yes.</p> <p>17 Q. Okay. When does it go to outside counsel</p> <p>18 at Ramsey? What's the policy there?</p> <p>19 A. We don't have a policy, so you would have</p> <p>20 to speak to our general counsel to learn the</p> <p>21 answer to that.</p> <p>22 Q. Okay. Did you talk to anyone who told</p> <p>23 you that things that Mr. Amos said were not</p> <p>24 true in his complaint?</p> <p>25 MS. SANDERS: You can answer that.</p>	<p style="text-align: right;">Page 200</p> <p>1 MS. SANDERS: You may ask him if --</p> <p>2 everybody he knows -- that's --</p> <p>3 MR. STREET: What's going to make you</p> <p>4 happy? That's what I -- what's going to make</p> <p>5 you happy?</p> <p>6 MS. SANDERS: I just told you.</p> <p>7 Unfortunately, you were talking over me, so you</p> <p>8 didn't hear me.</p> <p>9 MR. STREET: Well, that's -- that</p> <p>10 seems to be going around. But anyway --</p> <p>11 MS. SANDERS: Not from my end.</p> <p>12 MR. STREET: Yes, Leslie, you never</p> <p>13 do anything wrong.</p> <p>14 BY MR. STREET:</p> <p>15 Q. So, anyway, please, come again --</p> <p>16 MS. SANDERS: You're wrong.</p> <p>17 MR. STREET: No, I'm not.</p> <p>18 MS. SANDERS: You may ask him --</p> <p>19 MR. STREET: I'm not --</p> <p>20 MS. SANDERS: -- everybody -- every</p> <p>21 witness he believes has relevant information,</p> <p>22 you can ask him that.</p> <p>23 MR. STREET: Okay.</p> <p>24 MS. SANDERS: That's fine. Ask him.</p> <p>25 MR. STREET: And then I'll ask him</p>
<p style="text-align: right;">Page 199</p> <p>1 THE WITNESS: Yes.</p> <p>2 BY MR. STREET:</p> <p>3 Q. Who?</p> <p>4 MS. SANDERS: Objection.</p> <p>5 BY MR. STREET:</p> <p>6 Q. So there's witnesses who dispute what my</p> <p>7 client says, but you're not going to tell me</p> <p>8 who they are; is that what I'm hearing?</p> <p>9 MS. SANDERS: You have a list of</p> <p>10 every witness we know of with relevant</p> <p>11 information.</p> <p>12 MR. STREET: I'm asking your witness</p> <p>13 a question.</p> <p>14 BY MR. STREET:</p> <p>15 Q. Is that what your testimony is today?</p> <p>16 MS. SANDERS: You asked -- objection,</p> <p>17 it's privileged.</p> <p>18 You're asking him the people that I asked</p> <p>19 him to speak to --</p> <p>20 MR. STREET: I asked him who did he</p> <p>21 speak to.</p> <p>22 MS. SANDERS: You may ask him -- you</p> <p>23 may ask him --</p> <p>24 MR. STREET: I asked him who did he</p> <p>25 speak to.</p>	<p style="text-align: right;">Page 201</p> <p>1 what it is.</p> <p>2 MS. SANDERS: That's fine. It's all</p> <p>3 in the written documents. He can absolutely</p> <p>4 testify to that.</p> <p>5 MR. STREET: Then, let's do it that</p> <p>6 way that makes your attorney happy.</p> <p>7 BY MR. STREET:</p> <p>8 Q. Tell me every single witness you're aware</p> <p>9 of that has relevant information to this</p> <p>10 lawsuit.</p> <p>11 A. Luke LeFevre, David DiCicco, Lara</p> <p>12 Johnson.</p> <p>13 Q. Okay. Anyone else?</p> <p>14 A. No.</p> <p>15 Q. Okay. So no one dealt with Mr. Amos's</p> <p>16 complaints other than Luke LeFevre, DiCicco,</p> <p>17 and Lara Johnson?</p> <p>18 A. That is correct.</p> <p>19 Q. And did you speak with each of these</p> <p>20 individuals in investigating these claims?</p> <p>21 MS. SANDERS: Objection.</p> <p>22 BY MR. STREET:</p> <p>23 Q. Did you speak with them? I'm not asking</p> <p>24 you what they said; I'm asking did you speak</p> <p>25 with them.</p>

<p style="text-align: right;">Page 202</p> <p>1 MS. SANDERS: You can answer that.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. STREET:</p> <p>4 Q. Okay. And was that the extent of your</p> <p>5 investigation?</p> <p>6 MS. SANDERS: Objection, privileged.</p> <p>7 He may answer if he doesn't reveal any</p> <p>8 attorney-client privileged information.</p> <p>9 THE WITNESS: Those were the people</p> <p>10 with relevant information towards the case.</p> <p>11 BY MR. STREET:</p> <p>12 Q. So did you speak to anyone besides these</p> <p>13 three people? I'm not asking what they said;</p> <p>14 I'm just saying did you speak with anyone else?</p> <p>15 MS. SANDERS: You can answer that.</p> <p>16 THE WITNESS: No, those are the three</p> <p>17 people that I spoke with.</p> <p>18 BY MR. STREET:</p> <p>19 Q. How much -- do you know what I mean when</p> <p>20 I say ESI?</p> <p>21 A. Can you tell me?</p> <p>22 Q. It means electronically stored</p> <p>23 information, something lawyers say to shorten</p> <p>24 that up.</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 204</p> <p>1 search strings that were ran to find out what</p> <p>2 was in there.</p> <p>3 Q. Okay.</p> <p>4 A. I want to say it's over 6,000 documents</p> <p>5 that were reviewed.</p> <p>6 Q. Well, I'm interested in what the strings</p> <p>7 themselves were. Do you remember what they</p> <p>8 were?</p> <p>9 A. So, no, I'm not in IT, so I'm not sure</p> <p>10 the strings. I know "Brad" and "Amos," and</p> <p>11 "COVID," "accommodation." I know some of those</p> <p>12 things were used as search strings.</p> <p>13 Q. How did you come up with these --</p> <p>14 these -- what to look for? What terms did you</p> <p>15 look for?</p> <p>16 A. I did not come up with them. That was at</p> <p>17 the instruction of our attorneys.</p> <p>18 Q. And you -- by you, again, I mean --</p> <p>19 A. Lampo.</p> <p>20 Q. Yes. All right. Because I'm looking at</p> <p>21 the topic where -- Topic 25 -- we asked</p> <p>22 "methods used to cull relevant ESI prior to</p> <p>23 review," which it would include the search</p> <p>24 criteria for inclusion or exclusion in review.</p> <p>25 And I'm asking you how was the search criteria</p>
<p style="text-align: right;">Page 203</p> <p>1 Q. Yes?</p> <p>2 A. Yes, I know what it means.</p> <p>3 Q. What electric -- what electronically</p> <p>4 stored information was collected to review for</p> <p>5 this lawsuit for -- to answer these complaints?</p> <p>6 A. So that would have been, pretty much</p> <p>7 during that time period that was given, it</p> <p>8 would have been anything that had --</p> <p>9 Q. What time period are we talking about?</p> <p>10 A. It's the time period stated in the</p> <p>11 discovery. And so it would have been all</p> <p>12 electronic information that we had related to</p> <p>13 Brad Amos.</p> <p>14 Q. And so is it fair to say that the time</p> <p>15 period would have been the time period Mr. Amos</p> <p>16 was -- was applying to --</p> <p>17 A. I believe it started a little before that</p> <p>18 and --</p> <p>19 Q. Okay.</p> <p>20 A. -- ended a little after.</p> <p>21 Q. Okay.</p> <p>22 A. And so it was anything we had related</p> <p>23 to -- that had the name "Brad" or "Amos" or</p> <p>24 "COVID" related to "Brad Amos," "accommodation</p> <p>25 related to Brad Amos." There was a series of</p>	<p style="text-align: right;">Page 205</p> <p>1 developed in this case?</p> <p>2 A. That's correct. And so I stated anything</p> <p>3 that had the name Brad, just Brad by itself,</p> <p>4 Brad Amos combined --</p> <p>5 Q. Right. Let me ask you again. Listen to</p> <p>6 my question. I'm not asking what they were at</p> <p>7 this time, I'm asking you how they -- how you</p> <p>8 came up with these terms?</p> <p>9 MS. SANDERS: Objection, asked and</p> <p>10 answered. He can answer again.</p> <p>11 THE WITNESS: Because we were looking</p> <p>12 for anything related to Brad Amos.</p> <p>13 BY MR. STREET:</p> <p>14 Q. Who came up with the search terms?</p> <p>15 A. I want to say that was done collectively.</p> <p>16 Q. Collectively between --</p> <p>17 A. It wasn't one person. Collectively</p> <p>18 between our attorneys, myself.</p> <p>19 Q. Okay. And you're saying the terms</p> <p>20 included "Brad" or "Amos" or "COVID"?</p> <p>21 A. Or Brad Amos combined.</p> <p>22 Q. Or Brad --</p> <p>23 A. Or "COVID."</p> <p>24 Q. What else?</p> <p>25 A. Or "accommodation" or "work from home."</p>

<p style="text-align: right;">Page 206</p> <p>1 Q. Okay. What else?</p> <p>2 A. I don't recall all them, but I want to</p> <p>3 say that was the bulk of them.</p> <p>4 Q. As you sit here today -- that's all the</p> <p>5 ones you can tell me as you sit here today?</p> <p>6 A. Yeah.</p> <p>7 Q. All right. And you said there was about</p> <p>8 6,000 documents that you caught on these terms?</p> <p>9 A. Yes.</p> <p>10 Q. And then what happened once you collected</p> <p>11 these 6,000 documents? What happened to them</p> <p>12 then?</p> <p>13 A. We turned those in to our attorneys and</p> <p>14 reviewed them, but -- you didn't ask me this,</p> <p>15 but I was surprised how little there was, how</p> <p>16 little communication regarding Brad Amos.</p> <p>17 Q. Okay. And do you know what criteria was</p> <p>18 used to determine whether you want to give</p> <p>19 it -- the documents to turn over or not?</p> <p>20 A. Anything that was related to Brad Amos</p> <p>21 was turned in in discovery.</p> <p>22 Q. Okay. So every e-mail from Brad Amos, to</p> <p>23 Brad Amos should have been turned over?</p> <p>24 A. Yes.</p> <p>25 MS. SANDERS: Object to the form. He</p>	<p style="text-align: right;">Page 208</p> <p>1 Q. Okay. Who from Lampo participated in the</p> <p>2 EEOC investigation in this matter?</p> <p>3 A. So we turned that -- at that point, we</p> <p>4 had outside counsel, so we turned it over to</p> <p>5 outside counsel. I know that it involved Lara</p> <p>6 Johnson, Luke LeFevre, myself, and I believe</p> <p>7 that was it.</p> <p>8 Q. And DiCicco?</p> <p>9 A. Probably.</p> <p>10 Q. Besides the O'Connor lawsuit we talked</p> <p>11 about and the Amos lawsuit, were there any</p> <p>12 other complaints by employees of Lampo in</p> <p>13 2019-2020 for discrimination, harassment?</p> <p>14 A. Complaints made to -- outside of Lampo?</p> <p>15 Inside of Lampo?</p> <p>16 Q. Complaints made by Lampo employees to</p> <p>17 Lampo.</p> <p>18 A. No.</p> <p>19 Q. Those are the only two people that</p> <p>20 complained?</p> <p>21 A. During that time period?</p> <p>22 Q. During those two years.</p> <p>23 A. That is correct.</p> <p>24 Q. And you reviewed today to make sure</p> <p>25 that's the correct answer?</p>
<p style="text-align: right;">Page 207</p> <p>1 can answer.</p> <p>2 THE WITNESS: Yes, that's correct.</p> <p>3 MR. STREET: Okay.</p> <p>4 THE WITNESS: There are other Brads</p> <p>5 that work in the company.</p> <p>6 BY MR. STREET:</p> <p>7 Q. All right. I get it.</p> <p>8 But I'm saying every e-mail to or from</p> <p>9 Brad Amos, my client, is something that would</p> <p>10 have been turned over in discovery?</p> <p>11 MS. SANDERS: Object to the form.</p> <p>12 THE WITNESS: Related to the case,</p> <p>13 yes.</p> <p>14 BY MR. STREET:</p> <p>15 Q. Okay.</p> <p>16 A. So if there was an e-mail about, "Hey, we</p> <p>17 are having a meeting next week," and it's a</p> <p>18 meeting invite, calendar invite, then no, we</p> <p>19 wouldn't have turned that in.</p> <p>20 Q. Okay. But I'm asking you who made the</p> <p>21 determination whether it was relevant to the</p> <p>22 case or not. Is it something you gave to</p> <p>23 attorneys like that, or did you give it all to</p> <p>24 your attorneys and they decided?</p> <p>25 A. We gave it all to our attorneys.</p>	<p style="text-align: right;">Page 209</p> <p>1 A. That is correct.</p> <p>2 MR. STREET: All right. You want to</p> <p>3 pull up those interrogatories?</p> <p>4 MS. IRWIN: You have a copy.</p> <p>5 MR. STREET: Leslie, you have a copy</p> <p>6 of your interrogatory responses?</p> <p>7 MS. SANDERS: I do.</p> <p>8 THE WITNESS: I think these are</p> <p>9 yours.</p> <p>10 MR. STREET: They might be. I've</p> <p>11 walked off with them before, so...</p> <p>12 MS. IRWIN: Oh, yeah, those are</p> <p>13 yours. She's got the stamped one.</p> <p>14 MR. STREET: Let's make this Exhibit</p> <p>15 No. --</p> <p>16 MS. IRWIN: 5.</p> <p>17 MR. STREET: 5.</p> <p>18 (WHEREUPON, a document was marked as</p> <p>19 Exhibit 5.)</p> <p>20 THE WITNESS: Okay.</p> <p>21 BY MR. STREET:</p> <p>22 Q. If you'll take a second and look through</p> <p>23 those and tell me if you recognize those.</p> <p>24 A. Yes, I am familiar with them.</p> <p>25 Q. Okay. And what -- what are those as your</p>

<p style="text-align: right;">Page 210</p> <p>1 understanding?</p> <p>2 A. Responses to questions that you</p> <p>3 submitted.</p> <p>4 Q. Okay. And were you involved in putting</p> <p>5 these together?</p> <p>6 A. I was.</p> <p>7 Q. And these are the responses for Lampo who</p> <p>8 you are here testifying for today?</p> <p>9 A. That is correct.</p> <p>10 Q. Okay. And, again, I just want to make</p> <p>11 sure, I know I keep harping this, but this is</p> <p>12 not your deposition, okay, this is just for the</p> <p>13 company, all right?</p> <p>14 A. Got it.</p> <p>15 Q. All right. So looking at Interrogatory</p> <p>16 No. 1, it looks like the information submitted</p> <p>17 here was provided by Lara Johnson, David</p> <p>18 DiCicco, Armando Lopez, and that's it?</p> <p>19 A. Yes, that's correct.</p> <p>20 Q. Okay. All right. The next one we asked</p> <p>21 was to identify every person by name, address,</p> <p>22 and telephone number who has knowledge of the</p> <p>23 facts regarding this particular litigation. We</p> <p>24 have a few names: David DiCicco, Armando</p> <p>25 Lopez, J.B. Waggoner.</p>	<p style="text-align: right;">Page 212</p> <p>1 BY MR. STREET:</p> <p>2 Q. Right.</p> <p>3 A. Then it goes on to say the "Request is</p> <p>4 broadier than defendant's initial disclosure as</p> <p>5 it requests names and information regardless of</p> <p>6 whether defendant may use the individual to</p> <p>7 support claims or defenses."</p> <p>8 Q. Yeah, I mean, we don't -- we don't need</p> <p>9 you to read. It will be in the record. But</p> <p>10 I'm asking you about these three people.</p> <p>11 There's only three people identified in the</p> <p>12 response?</p> <p>13 A. Yes.</p> <p>14 MS. SANDERS: That's -- objection,</p> <p>15 that's not correct.</p> <p>16 MR. STREET: Okay. Your witness can</p> <p>17 look and see if there is another name I'm not</p> <p>18 seeing.</p> <p>19 BY MR. STREET:</p> <p>20 Q. Is there a fourth?</p> <p>21 MS. SANDERS: Now, but there's -- it</p> <p>22 says, "In addition to those identified in the</p> <p>23 initial disclosures."</p> <p>24 MR. STREET: Oh, okay.</p> <p>25 MS. SANDERS: And he doesn't have the</p>
<p style="text-align: right;">Page 211</p> <p>1 MS. SANDERS: For the record, his</p> <p>2 name is misspelled, Paul. I just noticed that.</p> <p>3 There's only one E on J.B. Waggoner.</p> <p>4 MR. STREET: I knew who you meant.</p> <p>5 BY MR. STREET:</p> <p>6 Q. Okay. Now, those are the only three</p> <p>7 people that Lampo has identified as to having</p> <p>8 any knowledge about this lawsuit?</p> <p>9 MS. SANDERS: Objection, that's not</p> <p>10 what it says.</p> <p>11 BY MR. STREET:</p> <p>12 Q. Okay. That's the only three names I see.</p> <p>13 Read through there and see if you see another</p> <p>14 one for me.</p> <p>15 A. I think the -- the names listed are to</p> <p>16 the specific question No. 2.</p> <p>17 Q. Right.</p> <p>18 MS. SANDERS: I'm just distracted by</p> <p>19 the storm. Apologies.</p> <p>20 THE WITNESS: Yeah, so the question,</p> <p>21 "Identify each person by name, address, and</p> <p>22 telephone number, who has knowledge of relevant</p> <p>23 facts relating to the subject matter of this</p> <p>24 litigation," and then state in detail.</p> <p>25</p>	<p style="text-align: right;">Page 213</p> <p>1 initial disclosures in front of him.</p> <p>2 MR. STREET: Do you want hand him</p> <p>3 those, too, then?</p> <p>4 BY MR. STREET:</p> <p>5 Q. And I will say, we don't -- apparently,</p> <p>6 we don't have a copy of it, but the only person</p> <p>7 who was actually that is listed in the Rule 26</p> <p>8 disclosures not identified here is Lara</p> <p>9 Johnson. I will take it back, also, and Luke</p> <p>10 LeFevre.</p> <p>11 A. Yeah, that completes the set then.</p> <p>12 Q. So it's this three people and those two</p> <p>13 was well?</p> <p>14 A. Correct.</p> <p>15 Q. What does J.B. Waggoner have knowledge of</p> <p>16 in this lawsuit?</p> <p>17 A. So he was the floor supervisor. We</p> <p>18 break -- we break into packs or pods, different</p> <p>19 groups of people to kind of work together.</p> <p>20 J.B. Waggoner would have been the floor</p> <p>21 supervisor over the pack that Brad Amos was a</p> <p>22 part of.</p> <p>23 Q. Okay. And correct me if I'm wrong, and I</p> <p>24 may get his name wrong, wasn't he one of the</p> <p>25 people on the board included on these e-mails?</p>

<p style="text-align: right;">Page 214</p> <p>1 A. He was not.</p> <p>2 Q. I'm thinking of somebody else's name,</p> <p>3 then. Yes, I'm thinking of Jack Galloway.</p> <p>4 Okay. And is Mr. Waggoner still with</p> <p>5 Lampo?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. So he said -- you're saying he was</p> <p>8 a floor supervisor, but what specifically would</p> <p>9 he know about this lawsuit?</p> <p>10 A. They work collaboratively as teams.</p> <p>11 Q. Okay.</p> <p>12 A. And so Brad Amos, Mr. Amos, would have</p> <p>13 been a part of that group that Mr. Waggoner</p> <p>14 would have been over as of -- kind of as a</p> <p>15 floor supervisor.</p> <p>16 Q. Okay.</p> <p>17 A. It's not a direct leader; he's just the</p> <p>18 floor leader. He's the direct leader when</p> <p>19 they're on the floor when they're actually</p> <p>20 doing editing, doing -- working together on a</p> <p>21 specific project or topic.</p> <p>22 Q. All right. I guess I want to ask you</p> <p>23 this. I mean, I could save it if we depose you</p> <p>24 individually, but since it's here in discovery,</p> <p>25 what do you know about Lampo's designation as a</p>	<p style="text-align: right;">Page 216</p> <p>1 this for every site. So the award itself is a</p> <p>2 Nashville best places to work. It's not like</p> <p>3 Inc. Magazine's best places to work. This is</p> <p>4 more like each city hires this company to do</p> <p>5 that independent study and then get awarded the</p> <p>6 Nashville best places to work or Seattle or</p> <p>7 wherever it happens to be.</p> <p>8 Q. All right. But you can't tell me the</p> <p>9 name of the company?</p> <p>10 A. I cannot, no, not off the top of my head.</p> <p>11 Q. All right. Do you know how it's</p> <p>12 determined who will win this award?</p> <p>13 A. Can you clarify your question?</p> <p>14 Q. Yeah.</p> <p>15 How do they clarify who is the best</p> <p>16 employer, best place to work?</p> <p>17 A. So there's anonymous surveys that get</p> <p>18 submitted. So team members get e-mailed the</p> <p>19 survey that they complete; those go to that</p> <p>20 third party; the third party then tabulates all</p> <p>21 the results; and using that criteria, award a</p> <p>22 best place to work. That's the same for</p> <p>23 Inc. Magazine, by the way.</p> <p>24 Q. Did Inc. Magazine come back and take you</p> <p>25 off the best places to work list, though?</p>
<p style="text-align: right;">Page 215</p> <p>1 best place to work?</p> <p>2 A. I know that we won ten years that</p> <p>3 designation.</p> <p>4 Q. What company was that from -- through?</p> <p>5 A. We've won it through two. One of them is</p> <p>6 a local Nashville-only best places to work.</p> <p>7 The second one is a national best places to</p> <p>8 work. I don't remember the national -- I don't</p> <p>9 remember the specific companies.</p> <p>10 Q. Was it an I-N-C, Inc.?</p> <p>11 A. Inc. Magazine, that's right. That's --</p> <p>12 Q. That's the national one?</p> <p>13 A. That's the national one. And we've only</p> <p>14 won that once, and then we've won nine other</p> <p>15 times in Nashville.</p> <p>16 Q. What was the one in Nashville?</p> <p>17 A. It was the best places to work.</p> <p>18 Q. Right. But what was the publication?</p> <p>19 A. It's Pinnacle Bank who kind of puts it</p> <p>20 on, but it's an independent third party that</p> <p>21 does the study.</p> <p>22 Q. But you don't know who it is?</p> <p>23 A. There's a company behind the best places</p> <p>24 to work, but they do it all across the country.</p> <p>25 So it's an independent third party that does</p>	<p style="text-align: right;">Page 217</p> <p>1 A. They did come back and take it off when</p> <p>2 the O'Connor lawsuit came to light. She went</p> <p>3 to the -- the answer is yes.</p> <p>4 Q. Okay. Why?</p> <p>5 A. Ms. O'Connor went on a media publicity,</p> <p>6 and even though the case is not resolved, they</p> <p>7 opted to remove us.</p> <p>8 Q. Did you speak with anyone or did anyone</p> <p>9 from Lampo speak to anyone at Inc. Magazine to</p> <p>10 dispute it?</p> <p>11 A. Nope. They sent an e-mail, and even</p> <p>12 though they understood it was pending</p> <p>13 litigation, they chose to take that action.</p> <p>14 Q. And no one at Lampo spoke with them after</p> <p>15 that about it?</p> <p>16 A. No. That would have been me, and we did</p> <p>17 not.</p> <p>18 MS. SANDERS: For the record, all</p> <p>19 Mr. Lopez's testimony is in the individual</p> <p>20 capacity of Mr. Lopez, not the company.</p> <p>21 MR. STREET: This Mr. Lopez?</p> <p>22 MS. SANDERS: Yes.</p> <p>23 MR. STREET: Well, he's here today</p> <p>24 talking about the company.</p> <p>25 MS. SANDERS: I know, but that wasn't</p>

<p style="text-align: right;">Page 218</p> <p>1 a topic. You said it. You said it at the 2 beginning.</p> <p>3 MR. STREET: No. I mean, I did ask 4 him about something he knew, but it's also on 5 the topic list. So I just want to make sure 6 we're clear, this is all testimony about the 7 corporation.</p> <p>8 MS. SANDERS: Well, where is it on 9 the topic list? Because I thought you just 10 said "I know this isn't on the list."</p> <p>11 MR. STREET: It's something like the 12 all discovery or somebody in this matter.</p> <p>13 MS. SANDERS: Okay. Well, objection, 14 outside the scope to all of the information 15 about the best place to work.</p> <p>16 MR. STREET: No. 28, "Any response 17 provided in discovery in this matter."</p> <p>18 MS. SANDERS: And objection, that's 19 broad.</p> <p>20 MR. STREET: There's no protective 21 order.</p> <p>22 MS. SANDERS: As I stated -- as I 23 stated in my written objections.</p> <p>24 BY MR. STREET: 25 Q. I just want to make sure I'm clear. I'm</p>	<p style="text-align: right;">Page 220</p> <p>1 MS. SANDERS: Object to the -- 2 outside the scope.</p> <p>3 BY MR. STREET: 4 Q. Still pending?</p> <p>5 A. No, I believe that settled.</p> <p>6 Q. Do you remember who her attorney was?</p> <p>7 A. Heather. I cannot think of Heather's 8 last name.</p> <p>9 Q. Was Heather the attorney for Ms. Stamps 10 and Ms. O'Connor, same attorney?</p> <p>11 A. I believe so.</p> <p>12 Q. Okay. All right. Who is Kristoffer 13 Sketch?</p> <p>14 A. He was a --</p> <p>15 MS. SANDERS: Objection, outside the 16 scope. You can answer if you know.</p> <p>17 THE WITNESS: Yeah, he's a candidate 18 that applied for a position at Lampo.</p> <p>19 BY MR. STREET: 20 Q. Okay. And but he ended up filing with 21 the Tennessee Human Rights Commission?</p> <p>22 A. Yes, he filed an EEOC complaint.</p> <p>23 Q. Okay. What did he say in his complaint 24 was the problem?</p> <p>25 A. Discrimination based on, I want to say, a</p>
<p style="text-align: right;">Page 219</p> <p>1 expecting your answers to be on behalf of the 2 corporation. If we need you personally, we'll 3 call you back.</p> <p>4 Who is Julie Anne Stamps?</p> <p>5 MS. SANDERS: Objection, outside the 6 scope. He may answer.</p> <p>7 THE WITNESS: She is an ex-team 8 member.</p> <p>9 BY MR. STREET: 10 Q. Okay. And she filed a lawsuit against 11 The Lampo Group?</p> <p>12 A. She did.</p> <p>13 Q. What was that lawsuit about?</p> <p>14 A. It was alleging discrimination based on 15 lesbian status.</p> <p>16 Q. Okay. Tell me more what happened that 17 led to this lawsuit.</p> <p>18 A. She filed a lawsuit alleging 19 discrimination based on lesbian status. She 20 had resigned her position voluntarily.</p> <p>21 Q. Okay. But she says she was terminated.</p> <p>22 A. She alleges to be terminated; she was 23 not.</p> <p>24 Q. Okay. Well, what was the -- the result 25 of that lawsuit?</p>	<p style="text-align: right;">Page 221</p> <p>1 medical condition, but I'm not 100 percent 2 sure. He filed a complaint with the EEOC.</p> <p>3 Q. Okay. And were there more lawsuits filed 4 against Lampo under Title VII or the Tennessee 5 Human Rights Act prior to these three lawsuits?</p> <p>6 A. In what time period? Since the inception 7 of the company?</p> <p>8 Q. Yes, since you -- yes.</p> <p>9 A. I believe there's one more aside from 10 those three.</p> <p>11 Q. And who is the plaintiff in that?</p> <p>12 MS. SANDERS: Objection, outside the 13 scope. You can answer.</p> <p>14 THE WITNESS: I don't recall the 15 name.</p> <p>16 BY MR. STREET: 17 Q. Do you recall when it was?</p> <p>18 A. It was before I got there, so it would 19 have been at least ten years old, maybe longer.</p> <p>20 Q. What about subsequent to Mr. Amos's 21 lawsuit, has anybody else filed under Title VII 22 or under Tennessee Human Rights violation?</p> <p>23 MS. SANDERS: Object, outside the 24 scope. He can answer.</p> <p>25 THE WITNESS: No.</p>

<p style="text-align: right;">Page 222</p> <p>1 BY MR. STREET:</p> <p>2 Q. All right. If you'll look at</p> <p>3 Interrogatory No. 4, and this, again, is</p> <p>4 talking about the facts/information considered</p> <p>5 by defendant in making a decision to terminate</p> <p>6 plaintiff's employees. And I won't re-read it</p> <p>7 because it will be in the record, so we'll have</p> <p>8 it there.</p> <p>9 But the people -- again -- again, these</p> <p>10 facts you mentioned were that Luke LeFevre,</p> <p>11 Lara Johnson, plaintiff met on July 31st, 2020,</p> <p>12 to discuss plaintiff's work performance, to</p> <p>13 work on a plan to improve his performance, and</p> <p>14 determine if plaintiff was willing to improve</p> <p>15 his performance?</p> <p>16 If I understood you correctly, the</p> <p>17 only -- none of that had anything to do with</p> <p>18 why you fired him. It wasn't his work</p> <p>19 performance, it was his disrespect to</p> <p>20 Mr. LeFevre.</p> <p>21 A. Correct. They met to discuss the work</p> <p>22 performance; he was terminated in that meeting</p> <p>23 because of insubordination.</p> <p>24 Q. Okay. Mr. LeFevre says discussed areas</p> <p>25 where plaintiff was not performing well. Were</p>	<p style="text-align: right;">Page 224</p> <p>1 As you sit here today, you don't know one thing</p> <p>2 he did to portray himself better than his</p> <p>3 coworkers.</p> <p>4 A. I know that's what's stated by</p> <p>5 Mr. LeFevre, so I'm certain that he has more</p> <p>6 specific facts about that.</p> <p>7 Q. "His lack of interest in the job," and it</p> <p>8 says, "As evidenced by missing deadlines." Are</p> <p>9 there any other facts that indicate that</p> <p>10 Mr. Amos had a lack of interest in his job</p> <p>11 other than this alleged missed deadline?</p> <p>12 A. That is what's stated here. So if there</p> <p>13 was more, then I would imagine that that would</p> <p>14 be in here.</p> <p>15 Q. Well, I mean, if there was more, you</p> <p>16 would have answered truthfully, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And if there was more, you would have put</p> <p>19 it in there, correct?</p> <p>20 A. That's correct.</p> <p>21 MS. SANDERS: Object to the form.</p> <p>22 BY MR. STREET:</p> <p>23 Q. And his failure to follow instructions.</p> <p>24 What did plaintiff do to -- how did he not</p> <p>25 follow instructions?</p>
<p style="text-align: right;">Page 223</p> <p>1 there e-mails between Mr. LeFevre and plaintiff</p> <p>2 where this kind of thing was discussed?</p> <p>3 A. It is not stated here.</p> <p>4 Q. I'm asking you were there; do you know?</p> <p>5 A. I'm not aware of any.</p> <p>6 Q. Okay. "Mr. LeFevre pointed out</p> <p>7 plaintiff's attitude of trying to portray</p> <p>8 himself as better than his team members."</p> <p>9 What did plaintiff do that made you think</p> <p>10 he was portraying himself better than his team</p> <p>11 members -- team members?</p> <p>12 A. It's not stated here.</p> <p>13 Q. Right.</p> <p>14 A. It would be speculation on my part.</p> <p>15 Q. Well, you're here for the company, and</p> <p>16 these are the company's responses. And I just</p> <p>17 want to know what does the company say that</p> <p>18 Mr. Amos did, what actions did he take to</p> <p>19 portray himself as better than his team</p> <p>20 members?</p> <p>21 A. It's not stated here, so it would be</p> <p>22 speculative on my part.</p> <p>23 Q. So you can't name one as you sit here?</p> <p>24 A. I can speculate as to what he did.</p> <p>25 Q. No, I only want to know what you know.</p>	<p style="text-align: right;">Page 225</p> <p>1 A. Mr. LeFevre could respond to that.</p> <p>2 Q. But the company can't tell me?</p> <p>3 A. It's not stated in here.</p> <p>4 Q. It says plaintiff was very least</p> <p>5 resistant to making any changes. What changes</p> <p>6 were suggested to plaintiff that he make that</p> <p>7 he refused to do?</p> <p>8 A. Which sentence are you on?</p> <p>9 Q. I'm on the next-to-the-last one of his</p> <p>10 response to paragraph -- to Question No. 4.</p> <p>11 A. The one that begins with "Plaintiff</p> <p>12 laughed at the suggestion. Mr. LeFevre</p> <p>13 determined that plaintiff was unwilling to or</p> <p>14 at the very least resistant to making any</p> <p>15 changes"?</p> <p>16 Q. Yes. I'm asking you what changes did you</p> <p>17 suggest plaintiff make that he refused to do?</p> <p>18 A. Those would be the -- that would be in</p> <p>19 the testimony of Mr. LeFevre. It is not</p> <p>20 written here.</p> <p>21 Q. Well, what is it? What were the changes?</p> <p>22 A. It's not written here.</p> <p>23 Q. Okay. So as you -- the company sits</p> <p>24 here, they can't tell me the changes?</p> <p>25 A. No. There were some recommendations for</p>

<p style="text-align: right;">Page 226</p> <p>1 improvement on performance that would have been 2 included as part of the performance improvement 3 plan, but the specifics are not included here. 4 Q. Okay. But I'm not asking you what they 5 are, I'm asking what's written here. I'm 6 asking you what they are. What specifics were 7 in there? 8 MS. SANDERS: Object, asked and 9 answered, but he can answer. 10 THE WITNESS: My answer is 11 Mr. LeFevre would know the specifics. 12 BY MR. STREET: 13 Q. Okay. But you can't tell me today as the 14 company? 15 A. That's right. 16 Q. Okay. Okay. Will you look at No. 7 for 17 me, please? I just want to make sure I 18 understand this response correctly. 19 We ask you to identify and describe all 20 statements including but not limited to 21 correspondence, verbal statements or 22 conversations, memoranda, voice mail messages, 23 recording, and electronic communications 24 regarding plaintiff's termination, concerns 25 about his job performance, concerns about his</p>	<p style="text-align: right;">Page 228</p> <p>1 provide to us? 2 MS. SANDERS: Objection. That's 3 privileged. 4 THE WITNESS: I was going to say our 5 attorney would know what they turned in or 6 didn't turn in. 7 BY MR. STREET: 8 Q. Like, for example, if you remember 9 earlier, we can go back and find it, but do you 10 remember the e-mail we looked at where I think 11 it was Mr. DiCicco or was it LeFevre who 12 claimed Mr. Amos's wife was crazy? Do you 13 remember this? 14 A. Uh-huh. 15 Q. Yes? 16 A. I do remember that. 17 Q. Okay. And this request asks for 18 statements regarding his personal life, 19 including his relationship with the family. 20 That's the only one we have. Is that the only 21 time they talked about his wife? 22 MS. SANDERS: Objection to the form. 23 You can answer, if you know. 24 THE WITNESS: So I don't know how 25 many times they talked about his wife. That is</p>
<p style="text-align: right;">Page 227</p> <p>1 personal life. And if I understand this 2 correctly, your response says that any of these 3 conversations would be reflected in the e-mails 4 that were provided. I could be wrong. 5 MS. SANDERS: Objection to the form. 6 He can answer. 7 THE WITNESS: So, yeah, it does state 8 what you said. It also states that we can't 9 possibly have everything documented regarding 10 his personal life or every single piece of 11 communication that took place, but it does also 12 state that everything that was relevant was 13 turned in. 14 BY MR. STREET: 15 Q. And who determined what was relevant to 16 this request? 17 A. Again, we searched under the criteria we 18 spoke about earlier. 19 Q. But you only gave me a fraction of those 20 documents you found, correct? 21 A. Correct. So all of the documents that 22 were surfaced under those search parameters 23 went to our attorneys, who then found relevant 24 documents to turn in. 25 Q. Did they find documents that they did not</p>	<p style="text-align: right;">Page 229</p> <p>1 the only thing that came out in the discovery 2 that had anything to do -- 3 BY MR. STREET: 4 Q. Right. You're saying as the corporation 5 here answering my questions on this discovery 6 today, that it could have been a thousand, it 7 could have been one, you don't know? 8 A. I know that we surrendered everything 9 that we found to our attorney who then -- 10 Q. Right. That's not what I'm asking you. 11 I'm asking as you sit here today on 12 behalf of the face of the corporation, I'm 13 asking you if there was just one statement ever 14 made over there by Ramsey employees regarding 15 my client's wife, and you're saying I don't 16 know; is that fair to say? 17 A. That's fair to say. 18 Q. Okay. 19 A. If you're asking me do I know how many -- 20 was there any conversation related to his wife 21 by any team member of Ramsey Solutions at any 22 point in time of his employment? 23 Q. Are there any e-mails? 24 A. No, they would have been turned in to 25 you.</p>

<p style="text-align: right;">Page 230</p> <p>1 Q. Okay. If you determined they were</p> <p>2 relevant?</p> <p>3 A. Well, they all went to our attorney, and</p> <p>4 it's part of this case, so I have no reason to</p> <p>5 believe they wouldn't have turned in something.</p> <p>6 Q. Okay. So as I said, as Lampo, you don't</p> <p>7 object if they did say something, but they give</p> <p>8 them to us now?</p> <p>9 MS. SANDERS: Objection to the form.</p> <p>10 THE WITNESS: So we've surrendered</p> <p>11 everything that we have.</p> <p>12 MR. STREET: Okay. Let's take about</p> <p>13 a ten-minute break, and we'll come back, and</p> <p>14 we'll finish up as quickly as we can after</p> <p>15 that.</p> <p>16 THE VIDEOGRAPHER: We are going off</p> <p>17 the record. The time is 4:02 p.m.</p> <p>18 (Short break.)</p> <p>19 THE VIDEOGRAPHER: We are back on the</p> <p>20 record. The time on the monitor is 4:14 p.m.</p> <p>21 BY MR. STREET:</p> <p>22 Q. Mr. Lopez, I did want to talk about on</p> <p>23 the notice we had a topic: "All communications</p> <p>24 between employees of defendant occurring</p> <p>25 between May 2019 and August 2020 related to its</p>	<p style="text-align: right;">Page 232</p> <p>1 weren't in these e-mails?</p> <p>2 A. Not to my knowledge, no.</p> <p>3 Q. Okay.</p> <p>4 MS. SANDERS: I'm sorry, John. Which</p> <p>5 one was that?</p> <p>6 MR. STREET: Topic 7.</p> <p>7 MS. SANDERS: 7. Okay.</p> <p>8 MR. STREET: Object to the breadth</p> <p>9 but certainly fine for him to answer.</p> <p>10 BY MR. STREET:</p> <p>11 Q. Now, if you look at the last page of</p> <p>12 Exhibit 1 --</p> <p>13 A. I need Exhibit 1, again. Thank you.</p> <p>14 Q. And you see the very last part of it with</p> <p>15 the documents requested, one page before that,</p> <p>16 there you go, do you see where it says,</p> <p>17 "Documents requested duces tecum"?</p> <p>18 A. Yes.</p> <p>19 Q. All right. And just to confirm, you did</p> <p>20 not bring any documents with you today to the</p> <p>21 deposition, did you?</p> <p>22 A. I did not.</p> <p>23 Q. Did you look for any documents before you</p> <p>24 came today?</p> <p>25 A. I did not.</p>
<p style="text-align: right;">Page 231</p> <p>1 decision to terminate Mr. Amos."</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. And -- and we talked -- we looked</p> <p>4 at several e-mails throughout the day --</p> <p>5 A. Correct.</p> <p>6 Q. -- regarding this, right?</p> <p>7 A. Yes.</p> <p>8 Q. Now, are you aware of any other</p> <p>9 communications between employees of defendant</p> <p>10 regarding the termination of Mr. Amos other</p> <p>11 than the e-mails we talked about today?</p> <p>12 A. I am not aware of any other than what was</p> <p>13 instructed under attorney-client confidential</p> <p>14 as part of the investigation.</p> <p>15 Q. Do you -- okay. But you saw the e-mails,</p> <p>16 right?</p> <p>17 A. Correct.</p> <p>18 Q. And you're saying the only other</p> <p>19 statements were made to your attorneys?</p> <p>20 A. Correct.</p> <p>21 Q. And besides the ones you made to your</p> <p>22 attorneys after the lawsuit was filed, were</p> <p>23 there any other statements not included in</p> <p>24 that -- those statements you made to your</p> <p>25 attorney after the lawsuit was filed that</p>	<p style="text-align: right;">Page 233</p> <p>1 Q. Now, Mr. Amos did work on some projects</p> <p>2 while he was there at Lampo?</p> <p>3 A. Yes.</p> <p>4 Q. And were those projects he did work on</p> <p>5 received well?</p> <p>6 A. To my knowledge, some of them were and</p> <p>7 some of them were not.</p> <p>8 Q. Okay. Some of them were not?</p> <p>9 A. Correct.</p> <p>10 Q. Like which ones were not?</p> <p>11 A. So the earlier conversation we were</p> <p>12 having, the conversation they were about to</p> <p>13 have with him involved some of the things that</p> <p>14 he had not been doing well.</p> <p>15 Q. And what were those things?</p> <p>16 A. Again, it's in -- listed in</p> <p>17 Mr. LeFevre's -- they were going to talk about</p> <p>18 the performance issues. You asked what were</p> <p>19 those specific things. I said you would have</p> <p>20 to ask Mr. LeFevre about the specifics.</p> <p>21 Q. Because sitting here today, you just</p> <p>22 can't tell me?</p> <p>23 A. That is correct. Because he is the one</p> <p>24 that has the material knowledge. He is the one</p> <p>25 that sat down to have that conversation with</p>

<p style="text-align: right;">Page 234</p> <p>1 him.</p> <p>2 Q. Okay. So other than what you're telling</p> <p>3 Mr. LeFevre would know, can you tell me</p> <p>4 anything else about Mr. Amos's work being</p> <p>5 subpar in any way?</p> <p>6 A. I know from the e-mail that David DiCicco</p> <p>7 wrote to Mr. LeFevre that he missed deadlines</p> <p>8 and didn't communicate on the -- that March</p> <p>9 e-mail.</p> <p>10 Q. Did anyone else review Mr. Amos's work</p> <p>11 besides Mr. DiCicco?</p> <p>12 A. I'm sure there were other people. They</p> <p>13 do a peer review as well as a team review of</p> <p>14 edited work.</p> <p>15 Q. Mr. Ramsey ever comment on a video made</p> <p>16 by Mr. Amos?</p> <p>17 A. Not that I'm aware of.</p> <p>18 Q. So besides this deadline -- and, again,</p> <p>19 the deadline he missed, what was that for?</p> <p>20 A. That deadline that he missed according to</p> <p>21 that document -- so if you'll bear with me?</p> <p>22 Q. Yeah, take your time.</p> <p>23 MS. IRWIN: Exhibit 4, for the</p> <p>24 record.</p> <p>25 THE WITNESS: Exhibit 4, yes.</p>	<p style="text-align: right;">Page 236</p> <p>1 correctly?</p> <p>2 A. Correct. That's what I'm taking it by as</p> <p>3 I'm reading it.</p> <p>4 Q. Okay. And the first missed deadline was?</p> <p>5 A. The first missed deadline was that "Cards</p> <p>6 and Quotes" that we were discussing earlier.</p> <p>7 Q. And is this -- what's the date of that</p> <p>8 e-mail you're reading just to make sure I'm on</p> <p>9 the same page here?</p> <p>10 A. This is David DiCicco to Luke LeFevre</p> <p>11 dated Tuesday, April 7th, 2020, at 12:17 p.m.</p> <p>12 Q. All right. Who set these deadlines?</p> <p>13 A. This would have been set collaboratively,</p> <p>14 but it would have been a group of people that</p> <p>15 would have set them. There's --</p> <p>16 Q. Who was in the group?</p> <p>17 A. So this would have probably been David</p> <p>18 DiCicco with the editors saying, "Here's when</p> <p>19 we have to deliver a product."</p> <p>20 Q. The editor being Mr. Amos?</p> <p>21 A. Correct.</p> <p>22 Q. So these deadlines were set by</p> <p>23 Mr. DiCicco and Mr. Amos?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. And the second deadline was the --</p>
<p style="text-align: right;">Page 235</p> <p>1 So it looks like there is a couple of</p> <p>2 things. One was that "Cards and Quotes" that</p> <p>3 you asked me about. And then --</p> <p>4 BY MR. STREET:</p> <p>5 Q. I want to make sure, you -- you didn't</p> <p>6 know what that was?</p> <p>7 A. That's correct.</p> <p>8 Q. Okay. Go ahead.</p> <p>9 A. And then the second one is where he's</p> <p>10 noticing that after we had the first</p> <p>11 conversation about missing the deadline, then</p> <p>12 there was a secondary missed deadline --</p> <p>13 Q. Right.</p> <p>14 A. -- that involved that video slash -- he</p> <p>15 called it something specific, so bear with me,</p> <p>16 and I'll tell you exactly what he called it.</p> <p>17 Q. Sure.</p> <p>18 A. He called it a story line. So that was</p> <p>19 the second missed deadline.</p> <p>20 Q. The deadline was for a story line?</p> <p>21 A. Yeah. So it says that was "The starting</p> <p>22 point to build the story out of." So that</p> <p>23 narrative structure.</p> <p>24 Q. Okay. But you said that was the second</p> <p>25 missed deadline. Did I understand you</p>	<p style="text-align: right;">Page 237</p> <p>1 it says, "Even after we had the first</p> <p>2 conversation about missing the deadline, you</p> <p>3 confidently told me the first half of the film</p> <p>4 would be cut by the following Friday." Do you</p> <p>5 see that?</p> <p>6 A. Yes. Down towards the bottom of that --</p> <p>7 Q. Is that the second -- yes, I'm sorry.</p> <p>8 A. That's what I'm considering to be the</p> <p>9 second.</p> <p>10 Q. Okay. Were these deadlines in writing</p> <p>11 somewhere?</p> <p>12 A. I don't know the answer to that question.</p> <p>13 My guess is when you go down to the video</p> <p>14 editing room, there's a big white board with</p> <p>15 projects that are going to be delivered, and</p> <p>16 every deliverable has a date and a name</p> <p>17 underneath that, who is responsible for</p> <p>18 delivering it and on what date.</p> <p>19 Q. Okay.</p> <p>20 A. So there might be a video shoot, for</p> <p>21 example, and the cinematographer that's</p> <p>22 responsible for that shoot's name's there with</p> <p>23 a date when that's due. That's one piece of a</p> <p>24 completed project. And then there is a date at</p> <p>25 the end of who is going to do the editing and</p>

<p style="text-align: right;">Page 238</p> <p>1 who is going to deliver the finished product.</p> <p>2 Q. Okay. But if -- if you didn't provide us</p> <p>3 an e-mail with a deadline set out in it in</p> <p>4 discovery, can I assume there was not an e-mail</p> <p>5 sent to Mr. Amos with these deadlines?</p> <p>6 A. That's correct. What I've seen in that</p> <p>7 area is a white board where they plan out all</p> <p>8 their projects and outlined who is going to do</p> <p>9 what.</p> <p>10 Q. Okay. But you don't e-mail them and tell</p> <p>11 them these are your deadlines?</p> <p>12 A. They're in the room when it's created.</p> <p>13 Q. What would Mr. DiCicco e-mail Mr. Amos</p> <p>14 about if not about work?</p> <p>15 A. Obviously, things like what we've read in</p> <p>16 these e-mails.</p> <p>17 Q. Right. But I haven't -- I mean, again,</p> <p>18 looking through these, there's not a lot from</p> <p>19 Mr. Amos here from Mr. Amos, there's a lot</p> <p>20 about Mr. Amos starting about -- about the time</p> <p>21 COVID started, but essentially before COVID</p> <p>22 started, there weren't e-mails discussing</p> <p>23 Mr. Amos's work?</p> <p>24 A. No.</p> <p>25 Q. Because you would have provided them?</p>	<p style="text-align: right;">Page 240</p> <p>1 Q. Are there notes Ms. Johnson takes?</p> <p>2 A. That would be a question for Ms. Johnson.</p> <p>3 We don't instruct our leaders to take notes</p> <p>4 during one-on-ones.</p> <p>5 Q. Okay. Why would you not want them to</p> <p>6 take notes?</p> <p>7 A. We don't instruct them not to, but we</p> <p>8 don't instruct them to.</p> <p>9 Q. Okay. What do you instruct these folks</p> <p>10 that the purpose of these one-on-one meetings</p> <p>11 is?</p> <p>12 A. It's to check in on each other,</p> <p>13 priorities, what do you need from me, what are</p> <p>14 the roadblocks that you're hitting, what do you</p> <p>15 need from me to get that project finished,</p> <p>16 et cetera.</p> <p>17 Q. I'm sorry. You done? I didn't mean to</p> <p>18 interrupt you.</p> <p>19 A. That's fine.</p> <p>20 Q. How long do these meetings usually take?</p> <p>21 A. Anywhere between 30 minutes and an hour.</p> <p>22 Each leader decides how much time is needed</p> <p>23 with that individual.</p> <p>24 Q. Is there guidance you provide to their --</p> <p>25 the leaders to tell them?</p>
<p style="text-align: right;">Page 239</p> <p>1 A. That's right.</p> <p>2 Q. Okay. And if there were something in</p> <p>3 writing about this -- deadlines that you're</p> <p>4 claiming that he missed, that would have been</p> <p>5 provided as well?</p> <p>6 A. That's correct.</p> <p>7 Q. So if it's not provided, I'm assuming</p> <p>8 they don't exist?</p> <p>9 A. They existed in a format that would have</p> <p>10 been erased like a white board.</p> <p>11 Q. Okay. Did anybody take a picture of that</p> <p>12 white board before --</p> <p>13 A. No, not to my knowledge.</p> <p>14 Q. -- it was erased?</p> <p>15 A. If we had it, we would have surrendered</p> <p>16 that.</p> <p>17 Q. Would the deadline have still been up</p> <p>18 there on the day Mr. Amos was fired on the</p> <p>19 white board?</p> <p>20 A. I doubt it. This was -- this e-mail was</p> <p>21 dated back April 7th.</p> <p>22 Q. Are these one-on-one meetings that</p> <p>23 Mr. Amos was having with Ms. Johnson, were they</p> <p>24 recorded in any way?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 241</p> <p>1 A. Yeah. So the guidance is you want to</p> <p>2 check in on the team member to see how they're</p> <p>3 doing --</p> <p>4 Q. Okay.</p> <p>5 A. -- so, first, individually; secondly,</p> <p>6 priorities, what are you working on; thirdly,</p> <p>7 how can I help, what do you need from me.</p> <p>8 Q. So your guidance doesn't tell them to ask</p> <p>9 about personal family lives, things like that?</p> <p>10 A. No. In fact, our guidance is available</p> <p>11 to everyone because it's part of that</p> <p>12 EntreLeadership book.</p> <p>13 Q. Okay. But your guidance that you give</p> <p>14 these folks doesn't say, "Hey, you should find</p> <p>15 out about their personal lives, family," things</p> <p>16 like that?</p> <p>17 A. It does not. But if I'm asking you how</p> <p>18 you are doing and you want to tell me how</p> <p>19 things are going at home, that is your</p> <p>20 decision.</p> <p>21 Q. Okay. But your testified that the</p> <p>22 company does not require folks to provide</p> <p>23 information about their personal lives?</p> <p>24 A. We do not require it, no.</p> <p>25 Q. Okay. But on the other hand, the company</p>


<p style="text-align: right;">Page 242</p> <p>1 does fire people for being lesbians; fair to</p> <p>2 say?</p> <p>3 MS. SANDERS: Objection to the form.</p> <p>4 THE WITNESS: Incorrect; not fair to</p> <p>5 say.</p> <p>6 BY MR. STREET:</p> <p>7 Q. Well, they fired Ms. O'Connor for having</p> <p>8 a baby outside of marriage; fair to say?</p> <p>9 MS. SANDERS: Object to the form.</p> <p>10 THE WITNESS: That's open litigation,</p> <p>11 and she wasn't fired for having a baby.</p> <p>12 BY MR. STREET:</p> <p>13 Q. What was she fired for?</p> <p>14 A. She was fired for having sex violating</p> <p>15 Righteous Living Policy.</p> <p>16 Q. Okay. So their lives -- personal lives</p> <p>17 are discussed in these meetings?</p> <p>18 A. No. That was not discussed in any</p> <p>19 one-on-one.</p> <p>20 Q. Okay. Well, how would they find out</p> <p>21 about this if they weren't discussed in these</p> <p>22 one-on-ones?</p> <p>23 A. Are are asking me to tell you about</p> <p>24 Ms. O'Connor specifically?</p> <p>25 Q. No. I'm asking you -- is it the</p>	<p style="text-align: right;">Page 244</p> <p>1 I just asked you.</p> <p>2 Q. Okay. So it's this book. There's</p> <p>3 nothing by Ramsey. It's just a book.</p> <p>4 A. There's a book available to anyone that</p> <p>5 wants to purchase it, but we use the same --</p> <p>6 that's how we run the company. So we would --</p> <p>7 one-on-one says how are you doing, right --</p> <p>8 Q. Uh-huh.</p> <p>9 A. -- what are you working on, what's your</p> <p>10 priorities, how can I help.</p> <p>11 Q. Okay. But there -- I just want to make</p> <p>12 sure I understand. These one-on-ones, do the</p> <p>13 leaders who conduct these one-on-ones ever have</p> <p>14 to report what is said to them to anyone else?</p> <p>15 A. No.</p> <p>16 Q. Are the weekly staff meetings, are they</p> <p>17 videotaped?</p> <p>18 A. No.</p> <p>19 Q. They're not put online somewhere for</p> <p>20 people to watch later?</p> <p>21 A. No.</p> <p>22 Q. Okay. What about the devotional</p> <p>23 meetings?</p> <p>24 A. No.</p> <p>25 Q. There's no evidence -- there's no</p>
<p style="text-align: right;">Page 243</p> <p>1 personal -- what did you call it -- the</p> <p>2 Righteous Living Policy?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Is that something that's discussed in</p> <p>5 these one-on-one meetings?</p> <p>6 A. No.</p> <p>7 Q. Never?</p> <p>8 A. Unless it gets brought up by someone. We</p> <p>9 don't say during that specific one-on-one,</p> <p>10 "Hey, ask -- ask about Righteous Living."</p> <p>11 Q. No, I get that.</p> <p>12 A. The only time Righteous Living surfaces</p> <p>13 is when someone else has brought it up to</p> <p>14 leadership, when someone else has brought it up</p> <p>15 to HR, and then it's investigated.</p> <p>16 Q. And when you investigate these righteous</p> <p>17 living -- I mean, who does those</p> <p>18 investigations?</p> <p>19 A. That would be myself and/or general</p> <p>20 counsel.</p> <p>21 Q. Is there a -- are there documents you</p> <p>22 give to these leaders to tell them how to do</p> <p>23 these one-on-one meetings?</p> <p>24 A. Yes. As I said, it's in the book</p> <p>25 EntreLeadership. It's the three questions that</p>	<p style="text-align: right;">Page 245</p> <p>1 recording of any of those things?</p> <p>2 MS. SANDERS: Object to the form.</p> <p>3 THE WITNESS: No, not to my</p> <p>4 knowledge. We may do some special something</p> <p>5 that we want to preserve for later that we</p> <p>6 might record, but, typically, no.</p> <p>7 BY MR. STREET:</p> <p>8 Q. And are the devotionals every week?</p> <p>9 A. Yes.</p> <p>10 Q. Every Wednesday, how long do those last?</p> <p>11 A. One hour.</p> <p>12 Q. And what time of day are they?</p> <p>13 A. 8:30 to 9:30.</p> <p>14 Q. Okay. And then Monday, what time is that</p> <p>15 staff meeting?</p> <p>16 A. Same time frame, 8:30 to 9:30, just on</p> <p>17 Mondays.</p> <p>18 Q. Okay. Is there any follow-up after these</p> <p>19 staff meetings, any kind of a, "Hey, here's</p> <p>20 what we talked about"?</p> <p>21 A. Sometimes. It depends what was</p> <p>22 discussed. This Monday, as an example, we</p> <p>23 talked about open enrollment for health care,</p> <p>24 and so that meeting was followed with an e-mail</p> <p>25 to -- instructions and next steps and how to --</p>

<div>Page 246</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div><div>25</div></div> <div><div>how to sign up for open enrollment.</div><div>Q. Okay. Were there ever staff meetings done during the pandemic on Zoom?</div><div>A. There were.</div><div>Q. Were those recorded?</div><div>A. No.</div><div>Q. Who set those up, those staff meetings up?</div><div>A. Can you clarify your question?</div><div>Q. Yes. Who actually set the Zoom up for everyone to log into? Who coordinated, I guess is the word?</div><div>A. I don't know the answer to that question.</div><div>MR. STREET: All right. I think that's all I have.</div><div>MS. SANDERS: The only thing I have is there were a few personnel matters discussed that would fit into the confidentiality order. So until we have had such time to review the transcript and designate those sections, the deposition will be deemed confidential until we're able to get the transcript.</div><div>MR. STREET: Our order says you can do that, but we have to say okay, and we're not saying okay. We're not saying okay until we</div></div>	<div>Page 248</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div><div>25</div></div> <div><div>MS. SANDERS: Same for me.</div><div>FURTHER DEPONENT SAITH NOT</div><div>(Proceedings concluded at 4:32 p.m.)</div></div>																																							
<div>Page 247</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div><div>25</div></div> <div><div>get a transcript. I'm not going to put it out anywhere, but it's in the transcript.</div><div>MS. SANDERS: Okay. That's all -- that's all I'm saying.</div><div>MR. STREET: I'm not going to say it's automatically confidential either.</div><div>MS. SANDERS: My point is I want an opportunity to designate the portions that are --</div><div>MR. STREET: Sure, that's fine.</div><div>MS. SANDERS: -- confidential under the confidentiality order.</div><div>MR. STREET: Well, you get 14 days once we get the transcript.</div><div>MS. SANDERS: That's exactly right.</div><div>MR. STREET: All right.</div><div>THE VIDEOGRAPHER: This marks the end of this deposition. We are going off the record. The time is 4:32 p.m.</div><div>(WHEREUPON, the following discussion was had off the video record.)</div><div>THE REPORTER: Are you ordering?</div><div>MR. STREET: Yes; just the transcript right now.</div><div>MS. IRWIN: Electronic only.</div></div>	<div>Page 249</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div><div>25</div></div> <div><div>C E R T I F I C A T E</div><div>I, ARMANDO LOPEZ, having read the foregoing deposition, Pages 1 through 248, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):</div><table><thead><tr><th>PAGE</th><th>LINE</th><th>SHOULD HAVE BEEN</th></tr></thead><tbody><tr><td>6</td><td>_____</td><td>_____</td></tr><tr><td>7</td><td>_____</td><td>_____</td></tr><tr><td>8</td><td>_____</td><td>_____</td></tr><tr><td>9</td><td>_____</td><td>_____</td></tr><tr><td>10</td><td>_____</td><td>_____</td></tr><tr><td>11</td><td>_____</td><td>_____</td></tr><tr><td>12</td><td>_____</td><td>_____</td></tr><tr><td>13</td><td>_____</td><td>_____</td></tr><tr><td>14</td><td>_____</td><td>_____</td></tr><tr><td>15</td><td>_____</td><td>_____</td></tr><tr><td>16</td><td>_____</td><td>_____</td></tr><tr><td>17</td><td>_____</td><td>_____</td></tr></tbody></table><div>ARMANDO LOPEZ</div><div>Notary Public</div><div>My Commission Expires: _____</div></div>	PAGE	LINE	SHOULD HAVE BEEN	6	_____	_____	7	_____	_____	8	_____	_____	9	_____	_____	10	_____	_____	11	_____	_____	12	_____	_____	13	_____	_____	14	_____	_____	15	_____	_____	16	_____	_____	17	_____	_____
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1 REPORTER'S CERTIFICATE
2 STATE OF TENNESSEE
3 COUNTY OF WILLIAMSON

4 I, Nicole Marie DeBartolo, court
5 reporter, with offices in Brentwood, Tennessee,
6 hereby certify that I reported the foregoing
7 deposition of ARMANDO LOPEZ by machine
8 shorthand to the best of my skills and
9 abilities, and thereafter the same was reduced
10 to typewritten form by me. I am not related to
11 any of the parties named herein, nor related to
12 their counsel, and have no interest, financial
13 or otherwise, in the outcome of the
14 proceedings.

15 I further certify that in order for this
16 document to be considered a true and correct
17 copy, it must bear my original signature and
18 that any unauthorized reproduction in whole or
19 in part and/or transfer of this document is not
20 authorized, will not be considered authentic,
21 and will be in violation of Tennessee Code
22 Annotated 3-914-104, Theft of Services.

23 
24 Nicole Marie DeBartolo, TN LCR, RPR, IL CSR
25 Tennessee Licensed Court Reporter
Registered Professional Reporter
Illinois Certified Shorthand Reporter, and
Certified Court Reporter.

26 TN LCR #915 - Expires: 6/30/2024
27 IL CSR #084-004127 - Expires: 5/31/2023

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